To: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Kata, Leonard" Mon 8/9/2010 5:17:08 PM
Subject	VW/Audi Meeting with EPA
Hello Jim	:
	elephone conversation, I am sending a request for a meeting with EPA staff on Thursday n, August 19, 2010.
Prelimina	ary discussion topics would be:
	Worst case emission and emission impact for OBD monitor
	HEV application for certification (example, open points)
	Worst case determination for FE (GHG) and emissions e.g. Start/Stop Switch
	Emission warranty part list for HEV parts and A/C system (GHG)
	Determination of OBD relevance
	Specific Hybrid test issues
l believe explanat	that we would need about 2 hours. I will try to refine the list of topics and provide better ion.
Best rega	ards,
Len	
Leonard	W. Kata
Manager	, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Kata, Leonard"

**Sent:** Tue 8/10/2010 12:49:33 PM

Subject: Tentative: VW/Audi Meeting with EPA: Misc issues

To: From:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)"
Sent: Subject:	Wed 8/11/2010 8:00:21 PM Diesel Shift Tables
Hello Jim,	
I will conta diesel.	act Germany for to see if any of the shift tables currently in the system will work for the M6
I should ha	eve an answer for you by the end of the week.
Best regar	ds,
Bob Hart	
DODITALL	
Robert Ha	rt
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Ham	lin Road
Auburn Hil	lls, MI 48326
Phone: 12A	
Fax: (248)	
	oert.hart@vw.com
L-IIIdii. I UL	oci chiai tee vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William"

**Sent:** Thur 8/12/2010 12:35:31 PM

Subject: RE: Confirmatory cert test data on the 2011 Jetta

william.rodgers@vw.com

Jim,

Thanks for the Jetta test results, we are evaluating it. Please send the Tiquan data to me when it becomes available because Bob Hart is out of the office today.

Just FYI, The Bentley is in route to Ann Arbor. Axel Reisner will be present when it arrives.

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, August 11, 2010 4:26 PM To: Hart, Robert (VWoA); Rodgers, William

Subject: Confirmatory cert test data on the 2011 Jetta

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]

From: "Rodgers, William"

**Sent:** Fri 8/13/2010 12:27:58 PM **Subject:** VW36100220 Release

william.rodgers@vw.com

Hello Jim,

Can you please make arrangements to release the Jetta #VW36100220 so we can pick it up after we deliver the other Jetta (VW36100250) on Monday morning the 16th.

Thanks,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Fri 8/13/2010 12:47:29 PM Diesel Shift Tables
Hello Jim,	
indicated i	to our diesel cert engineer, shift tables 590 0035 (FTP) and 590 0036 (HFET) can be used as n the MY 2009 Application Common Sections (Section 12). These shift tables should already be Lab database. They are the standard VW gasoline engine M6 shift tables.
Here are th	ne upshift points by speed.
UP-SHIFT	
1 - 2 15 m	nph
2 - 3 25 m	nph
3 - 4 40 m	nph
4 - 5 47 m	nph
5 - 6 52 m	nph
Due to the	grow waters in the disculture revision the fallowing declutch points wout he wood.
DECLUTCH	gear ratios in the diesel transmission the following declutch points must be used:
6-0 30 m	
5 - 0 25m	
4 - 0 20m	
l am still w	raiting for the US06 schedule.
Best regard	ds,

1

Bob Hart
From: Hart, Robert (VWoA) Sent: Wednesday, August 11, 2010 4:00 PM To: 'Snyder.Jim@epamail.epa.gov' Subject: Diesel Shift Tables
Hello Jim,
I will contact Germany for to see if any of the shift tables currently in the system will work for the M6 diesel.
I should have an answer for you by the end of the week.
Best regards,
Bob Hart
Robert Hart
Engineering and Environmental Office
Linging and Literature Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
Phone: (248) 754-4224
Fax: (248) 754-4207
E-mail: robert.hart@vw.com

Cc: From: Sent: Subject:	"Reisner, Axel, Dr. (EASZ/1)" [axel.reisner@volkswagen.de] "Hart, Robert (VWoA)" Wed 8/18/2010 1:01:04 PM Retest Request for VW Tiguan - VW416 80218 cfg. 0
- a.a.j a.	· · · · · · · · · · · · · · · · · · ·
Hello Jim,	
l informed	Vince Mazaitis that Volkswagen has requested a retest of the FTP and HWFET for the VW
Tiguan – V\	N416 80218 cfg. 0.
Both fuel e	conomy values are more than 3% different from the manufacturer test results.
Best regard	ds,
Bob Hart	
Robert Har	†
No Serviral	
Enginoorin	g and Environmental Office
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hill	ls, MI 48326
Phone: (24	8) 754-4224
Fax: (248)	754-4207
E-mail: rob	ert.hart@vw.com

To:

Jim Snyder/AA/USEPA/US@EPA[]

To: From:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)"
Sent: Subject:	Thur 8/19/2010 4:36:38 PM VW Group: Retest Request for Volkswagen Test Vehicle VW36100250 cfg. 0
Hello Jim,	
Volkswage	n requests a retest for both the HWFET and US06 for test vehicle VW36100250 cfg. 0.
Volkswage	n has accepted the test results for the FTP for that vehicle configuration.
Best regard	ds,
Bob Hart	
Robert Hai	·*
Robertilai	
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Ham	lin Road
Auburn Hil	ls, MI 48326
Phone: (24	8) 754-4224
Fax: (248)	754-4207
E-mail: rob	pert.hart@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[] From: "Hart, Robert (VWoA)" Sent: Mon 8/23/2010 7:17:44 PM
Subject: VW Group: Letter to Allow Porsche to Use VW Test Results  CBI BVWX CORRES LETTER01 R00.PDF
Hello Jim,
The attached letter has been submitted through the Verify System.
The letter grants permission for Porsche to use VW test results from the MY 2011 VW Touareg Hybrid in test group BVWXT03.0HEV for the emissions certification of the Porsche Cayenne Hybrid.
Best regards,
Bob Hart
Robert Hart
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
Phone: (248) 754-4224
Fax: (248) 754-4207
E-mail: robert.hart@vw.com

## VOLKSWAGEN

#### GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105 Leonard W. Kata Name
Manager – Emis. Cert. Title
EEO Department
248-754-4204 Phone
248-754-4207 Fax
Ieonard.kata@vw.com E-Mail

August 23, 2010 Date

Subject: Carry Across of MY 2011 Volkswagen Emission Test Data to Porsche for Certification of Cayenne Hybrid

Dear Mr. Snyder,

The model year 2011 Volkswagen Touareg Hybrid and Porsche Cayenne Hybrid were developed together and share the same test vehicle. Porsche has permission from Volkswagen AG to carry across the Volkswagen manufacturer emissions tests and EPA confirmatory tests from the Touareg Hybrid for emissions certification of the Cayenne Hybrid.

VOLKSWAGEN GROUP OF AMERICA, INC. 3800 HAMLIN ROAD AUBURN HILLS, MI 48326 PHONE +1 248 754 5000

Sincerely,

Leonard W. Kata

Volkswagen Group of America, Inc.

**Engineering and Environmental Office** 

Enclosure(s)

To: Jim Snyder/AA/USEPA/US@EPA[]
From: "Hart, Robert (VWoA)"
Sent: Wed 8/25/2010 7:56:28 PM
Subject: VW Group: Test Type Question
image001.gif
image002.gif

Hello Jim,

The tests listed for the Touareg Hybrid (T.G.: BVWXT03.0HEV) in Verify are 1 FTP, 1 HWFE and 2 US06 (I'm guessing one 2-Bag and one 1-Bag w/PM). See highlighted info below.

The FTP is listed as type 21 which is a standard Federal fuel 2-day exhaust (w/can load).

Is this correct or will it be a UDDS? Is this just a limitation of the Verify System - maybe it hasn't been coded to indicate a UDDS test yet?

**Bob Hart** 

Vehicle selected for Test VW526710023, Supplemental Information needed - Message

From:

Verify Administrator

Subject:

Vehicle selected for Test VW526710023, Supplemental Information needed

Date:

Fri 8/13/2010 1:26 PM

Your recent submission has been selected by the EPA for Confirmatory Testing for the following vehicle: Manufacturer: VWX Vehicle ID: VW526710023 Vehicle Configuration: 0 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 3 - HWFE 61 - Tier 2 Cert Gasoline 21 - Federal fuel 2-day exhaust (w/can load) 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline

Manufacturer Code: VWX Vehicle ID: VW526710023 Vehicle Configuration #: 0 Test Group Name: BVWXT03.0HEV Transaction Identifier: \_edc7f15d-c98b-40ac-9520-7f64fb8b3c88 Robert Hart **Engineering and Environmental Office** Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Phone: (248) 754-4224

E-mail: robert.hart@vw.com

Fax: (248) 754-4207

To: axel.reisner@volkswagen.de[]

**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; N=Stephen

Healy/OU=AA/O=USEPA/C=US@EPA[]

From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

**Sent:** Fri 9/3/2010 11:07:16 AM **Subject:** Re: Vw test results pending

VW36100250 9-2-10.pdf

Good morning Axel,

Please find enclosed the Laboratory test results for VW36100250. If you have any questions or concerns, please contact me.

Thanks Axel,

Best regards,

Vince Mazaitis

From: Jim Snyder/AA/USEPA/US

To: Jim Snyder/AA/USEPA/US@EPA, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>

Cc: "Reisner, Axel, Dr. (EASZ/1)" <axel.reisner@volkswagen.de>, Stephen Healy/AA/USEPA/US@EPA,

Vincent Mazaitis/AA/USEPA/US@EPA
Date: 09/02/2010 04:45 PM
Subject: Re: Vw test results pending

Looks like the data is already in Verify.

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US

To: Vincent Mazaitis/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA

Cc: "Reisner, Axel, Dr. (EASZ/1)" <axel.reisner@volkswagen.de>

Date: 09/02/2010 04:38 PM Subject: Vw test results pending

Vince, I won't be in Friday. If the results on today's test of the VW Jetta VW36100250 are released,

please email them to Axel (email above) so he can determine whether to stay or head home.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

**VWX** 

**NVFEL Laboratory Test Data** Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0225-008

Test Date: 9/2/2010

Key Start: 13:16:19

Fuel Container ID: F00023

Test Information

JHITED STATES

Fuel Type: 61 Tier 2 Cert Test Fuel

Vehicle ID: VW36100250

MFR Name VOLKSWAGEN

MFR Codes: 590

Config #: 00

PROTECTION	Test Procedure: Calculation Method: Pretest Remarks:	61 Tier 2 Cert Te 89 us062bag (usi Gasoline	st Fuel 06warmup_2bagus06)		Transmission: Shift Schedule: eginning Odometer: Drive Schedule:	A09980041	agus06
Bag Data	HC-FID	CO	NOx	CO2	CH4	NonMeth HC	
Phase 1 Sample Ambient	(ppmC) 6.218	(ppm) 340.639	(ppm) 0.168	(%) 0.826	(ppm) 3.387	(ppmC)	
Net Concentration	2,360 4.010	0.000 340.639		0.042 0.787	1.898 1.611	2.168	
R Phase 2	emarks:						
Sample	8.161	498.346	0.208	1.128	4.495		
Ambient	2.392	0.000	0.009	0.043	1.899		
Net Concentration	5.980	498.346	0.199	1.088	2.763	2.821	
Phase 3 Sample Ambient Net Concentration	emarks:						
Re Phase 4 Sample Ambient Net Concentration	emarks:						
	emarks:						
	HC-FID (gpm) hase 1 0.080 hase 2 0.052	CO (gpm) 13.764 8.787	(gpm) (g 0.010 4	2 <u>02</u> Ipm) 99.5 01.6	(gpm) 0.037	NMHC / NMOG (gpm) 0.043 / 0.045 0.025 / 0.026	Vol MPG (mpg) 17.054 28.176

Composite

Phase 1

Phase 2

Composite

EPAVDAEm100902122739

0.05842

Gasoline MPG

17.04

28.15

24.62

9.88776

Page 1 of 2

0.00632

345.356

0.02999

**Dyno Settings** 

EPA Set Co C: 0.01389 Emissions Bench: Mexa 7200sle

EPA Set Co A: 5.22 EPA Set Co B: 0.379

Inertia: 3250

(NMOG=1.04xNMHC)

0.0288 / 0.0299

Print Time 02-Sep-2010 13:40

Dyno #: D329 - FWD

Fuel Economy

v100414 - d329

			NVFEL	Laboratory To	est Data			cvs
		Final Labora Test Number: 2	tory Test Resu	Its- Refer to VER	IFY Reports for		. 101100400000	
Results		HC-FID	<u>CO</u>	NOx	CO2		): VW36100250	Math Danne
UNITED STATES		(grams)	(grams)	(grams)		CH4	NMHC	Meth Respons
Jun Cu	Phase 1	0.142	24.353	0.017	(grams)	(grams)	(grams)	1.143
	Phase 2	0.325	54.736		883.7	0.066	0.077	
	(i) 11030 Z	0.020	04.736	0.033	1878.7	0.174	0.153	
	<b>₹</b> /				•			
The PROTECTS	7							
PHOT				-				
est Condition	œ		Phase 1	Dhone 2	Db 0	<b>D</b>		
our contamon		arometer (inHg)		Phase 2	Phase 3	Phase 4		
	Ave Ce	alonieler (inng)	28.99	28.99				
		ell Temp (degF)	74.58	74.64				
	De la la la	ew Point (degF)	51.52	51.53				
;		dity (grains/lbm)	58.54	58.56				
		Ox Corr Factor	0.9282	0.9283				
		Dilution Factor	15.567	11.372				
	CFV V	mix (scf @68F)	2168.38	3331.35				
	CVS Flow F	Rate Avg (scfm)	548.96	547.62				
		01						
	h	an Placement: U		e Large Fan - Dov				
		ise Time (secs)	130.01	364.99	107.00			
,		Distance (miles)	1.769	6.229				*
	Bag Analys	sis Time (secs)	110.2	322.1				
							•	
				,				
	•							
D Took Doord	in 6	an Danasation 00 t	1000					
R Test Resul	<u>ts</u> ic	or Procedure 90 L	JS06					
3.4	ED Number	u^	00	NO	222			
141	FR Number 1E+07	<u>HC</u>	<u>CO</u>	NO <sub>X</sub>	<u>CO2</u>	NMOG	NonMeth HC	
	IETU/	0.0297	2.24	0.0067	296	0	0.0208	
	Odometer	MPG			MEDILL			
	3305 M	29.7			MFR Lab:	Volkswagen AG	, Dept EASZ/1	
^			inhanthau CDA	uno.	-	• •		
/)	0 1	IPG is 20.61 % hi	igner man EPA	MPG	Dyno:			
Ih.	المصروبا كرمه	MBC.	norpa	1/5	Fuel: (	61 Tier 2 Cert G		
, ,	I have velide	- 1	//	1 11111	150 131 B/	o ok	DV 9-2	- <i>(i</i> )
	i nave valida	neu ine data in ac	xordance with	the requirements of	of TP 730 \ 101		~ 1 6	
				1 - 11		2/2/10		
				62797		712410 -		
	Validated D.							
	Validated By	*		270 . /	Date:		WHICH I A THE	
	Validated By	*			Date:		MANAGE CO. C.	



**WX** 

CVS

**NVFEL Laboratory Test Data** 

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0225-009 Test Date: 9/2/2010

Vehicle ID: VW36100250

Test Information

MFR Name VOLKSWAGEN



Key Start: 12:03:18 Fuel Container ID: F00023

MFR Codes: 590 Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Transmission: AUTO

Test Procedure: 03 HWFET (hwfetprep\_hwfet)

Shift Schedule: A09980011 Beginning Odometer: 003434.0 MI

Calculation Method: Gasoline

Pretest Remarks:

Drive Schedule: hwfet\_hwfet

Bag Data	HC-FID	<u>co</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	NonMeth HC	
Phase 1	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	3.416	6.733	0.059	1.073	2.376		
Ambient	2,453	0.000	0.013	0.044	1.922		
Net Concentration	1.159	6.733	0.047	1.032	0.608	0.464	

Remarks:

Phase 2

Sample **Ambient** 

**Net Concentration** 

Remarks:

Phase 3

Sample Ambient

**Net Concentration** 

Remarks:

Phase 4

Sample **Ambient** 

**Net Concentration** 

Remarks:

Resu	<u>ts</u>	HC-FID	<u>co</u>	<u>NOx</u>	CO2	<u>CH4</u>	NMHC / NMOG	Vol MPG
1		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
1	Phase 1	0.008	0.089	0.001	215.4	0.005	0.003 / 0.003	41.253

(NMOG=1.04xNMHC)

Fuel Economy

Gasoline MPG Phase 1 41.21

**Dyno Settings** 

Dyno #: D329 - FWD

Inertia: 3250 EPA Set Co A: 5.22

EPA Set Co B: 0.379 EPA Set Co C: 0.01389

Emissions Bench: Mexa 7200sle

v100414 - d329\_

\_EPAVDAEm100902113910

Page 1 of 2

Print Time 02-Sep-2010 12:26

	NVFEL	. Laboratory T	est Data			CVS
Final Lat	oratory Test Resu	ilts- Refer to VER	IFY Reports for			
Results HC-FID (grams) Phase 1 0.078	er: 2010-0225-009 CO (grams) 0.914	<u>NOx</u> (grams) 0.010	<u>CO2</u> (grams) 2203.2	Vehicle II <u>CH4</u> (grams) 0.047	D: VW36100250 <u>NMHC</u> (grams) 0.031	Meth Respo
WHEN AL PROTECTOR	**************************************	**************************************	P. T.			
est Conditions Barometer (inl-	<u>Phase 1</u> lg) 28.99	Phase 2	Phase 3	Phase 4		
Avg Cell Temp (deg						
Dew Point (deg Specific Humidity (grains/lb						
NOx Corr Fac						
CO2 Dilution Fac						
CFV Vmix (scf @68						
CVS Flow Rate Avg (scf	m) 323.00					
Fan Placeme Phase Time (sec	nt: One Fan - Dowr s) 765.10	ı - Front				
Distance (mile	s) 10.230					
Bag Analysis Time (sec	s) 105.2					
ED Tool Doorle				•		
FR Test Results for Procedure						
MFR Number HC 1E+07 0.0112	<u>CO</u> 0.11	NOx 0	<u>CO2</u> 221	<u>NMOG</u> 0	NonMeth HC 0.0073	
Odometer MPG 3175 M 40.1	PM 0.018 % lower than EPA I	MDC		-	G, Dept EASZ/1	
1911 O 13 -2.70	70 IUNGI BIGII LI'A I	wi G	Dyno: Fuel:	61 Tier 2 Cert (	Gasoline	
I have validated the data	in accordance with	the requirements	of TP 730	_		
Validated By:	4417		D-4:	9-2-	-/p	
vanuated by.	<del>'</del> /'		Date:			

9/2/2010 12:26 PM

Page 2 of 2

Print Time 02-Sep-2010 12:26

To: From:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)"
Sent: Subject:	Tue 9/21/2010 3:50:44 PM VW Group: MY 2011 VW Touareg Hybrid
Hello Jim,	
	a revised MY 2011 VW Group Common Sections today. You should now be able to find the y description.
The pages	that were updated are listed on Section 15VW Page 1.
Best regard	ds,
Bob Hart	
Robert Har	
кореп паг	ι
Engineerin	g and Environmental Office
J	
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	ls, MI 48326
Phone: (24	8) 754-4224
Fax: (248)	754-4207
E-mail: rob	ert.hart@vw.com

**To:** christoph.kohnen@vw.com;richard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; ichard.thomas@vw.com;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** john.finneran@nhtsa.dot.gov;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff

Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben

Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=R obert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron

Hula/OU=AA/O=USEPA/C=US@EPA[]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben

Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=R obert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron

Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Jeff

Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben

Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=R obert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron

Hula/OU=AA/O=USEPA/C=US@EPA[]; lan.berkowitz@nhtsa.dot.gov;CN=Ben

Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=R obert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron

Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Ben

Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=R obert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron

Hula/OU=AA/O=USEPA/C=US@EPA[];

arry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert

Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; erry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Robert

Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Thur 10/7/2010 4:09:41 PM

Subject: EPA CAFE letter & calculation attached - 2009 Volkswagen IP, LT

2009-0590-LT-CAFE-V127.pdf 2009-0590-IP-CAFE-V127.pdf

This e-mail message forwards a signed EPA letter and Corporate Average Fuel Economy (CAFE) calculation to your office.

CONFIDENTIALITY: The cover letter and the summary information on the "CAFE report" page are not confidential. However, the information included in the calculation section of the attached PDF file contain sales information in more detail than is normally available to competitors and to the general public. Release of the calculation section of this PDF file is not authorized.

This e-mail and the Adobe Acrobat (.pdf) attachment are an official Agency action. If there is a problem with the attachment or if you are not the intended recipient, please contact your certification team representative immediately. Adobe Acrobat Reader version 5.0 or later is required to open the attached PDF document(s).

To: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]
Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]
From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

**Sent:** Thur 10/14/2010 10:48:25 AM

**Subject:** Bentley 15113 15113 10-13-10.pdf

Good morning Bob,

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thanks,

Vince Mazaitis

				Laboratory To				cvs
				Its-Refer to VER	IFY Reports	s for Official Data		
Test Information	/ <del>*</del>		2010-0276-005			Vehicle ID:		
rest iniormation	Key S		10:57:27 / 09:37	,		MFR Codes:	BENTLEY MOT	ORS LTD. BEX
JANTED STATES		el Container ID:						BEX
TO BLUMPS OF THE PROPERTY OF T	rui		61 Tier 2 Cert Te	not Eurol	•	Config #:		
	۱ -			est ruei 2-day exhaust (w/d	oon loo	Transmission:		
(E - W - 3)		ulation Method:		z-uay exilausi (w/		Shift Schedule:		
AL PROTECT		etest Remarks:	Gasonne			Beginning Odometer:		
The state of the s	FI	etest Kemarks.				Drive Schedule:		
						Soak Period:	20.6 hours	
Bag Data		HC-FID	CO	NOx	CO2	CH4	NonMeth HC	
Phase 1		(ppmC)	(ppm)	(ppm)	<u>302</u> (%)	(ppm)	(ppmC)	
Sample	<b>:</b>	13.448	81.656	1.107	1.314	3.708	(ppino)	
Ambient		3.591	0.000	0.033	0.046	1.966		
Net Concentration	ı	10.211	81.656	1.077	1.273	1.935	7.865	
							,,,,,,	
Phase 2	Remarks:							
<u>Fitase z</u> Sample		3.575	1.402	0.043	0.942	1.838		
Ambient		3.634	0.000	0.043	0.942	1.940		
Net Concentration		0.197	1.402	0.020	0.899	0.034	0.155	
101 0011001111011011		0.107	1.402	0.020	0.000	0.034	0.100	
								•
	Remarks:							
Phase 3								
Sample		4.573	4.199	0.179	1.133	1.956		
Ambient		4.628	0.000	0.027	0.046	2.011		
Net Concentration		0.337	4.199	0.154	1.091	0.115	0.197	
							•	
	Remarks:							
<u>Phase 4</u>								
Sample								
Ambient								
Net Concentration								
	Remarks:							
Results		HC-FID	<u>co</u>	<u>NOx</u>	<u>CO2</u>	CH4	NMHC / NMOG	Vol MPG
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
	Phase 1	0.185	2.989	0.058	732.1	0.041	0.143 / 0.148	12.057
	Phase 2	0.006	0.081	0.002	821.1	0.001	0.004 / 0.005	10.826
	Phase 3	0.006	0.152	0.008	619.7	0.002	0.004 / 0.004	14.341
	Weighted	0.04301	0.70427	0.01516	747.222		NMOG=1.04xNMHC) 0.0329 / 0.0342	
uel Economy	(	Gasoline MPG			······································	Dyno Settings	Dyno #:	D005
	Phase 1	12.05					Inertia:	
	Phase 2	10.82					EPA Set Co A:	
	Phase 3	14.33					EPA Set Co B:	
						4	EPA Set Co C:	
	Weighted	11.87		•	•	•	Emina Danet	DOGE
	AVDAEm1010			Page 1 of 2	* ; *, **; ****,		Emiss-Bench:	
		·~ (VV7V)		· vgo i vič			Print Ha	e 13-Oct-2010 11:

		Laboratory T				cvs
Final Laborate Test Number: 2		Its- Refer to VER	IFY Reports for	Official Data Vehicle ID	· 15112	
Phase 1 0.662 Phase 2 0.022 Phase 3 0.022	CO (grams) 10.686 0.312 0.543	<u>NOx</u> (grams) 0.207 0.007 0.029	CO2 (grams) 2617.2 3147.3 2217.8	CH4 (grams) 0.145 0.004 0.009	NMHC (grams) 0.510 0.017 0.013	Meth Response
Barometer (inHg) Avg Cell Temp (degF) Dew Point (degF) Specific Humidity (grains/lbm) NOx Corr Factor CO2 Dilution Factor CFV Vmix (scf @68F)	Phase 1 29.06 75.23 47.28 49.73 0.8939 10.127 3969.34	Phase 2 29.06 75.29 47.19 49.59 0.8933 14.224 6755.66	Phase 3 29.06 75.38 47.64 50.44 0.8965 11.820 3925.20	Phase 4		
CVS Flow Rate Avg (scfm)	469.56	466.12	465.44			
Fan Placement: O Phase Time (secs) Distance (miles) Bag Analysis Time (secs)	ne Fan - Up - f 507.20 3.575 76.4	Front 869.59 3.833 73.6	506.00 3.579 74.0			
•			•			,
R Test Results for Procedure 21 F	ederal fuel 2-d	ay exhaust (w/ca	n load)			•
MFR Number HC 1E+07 0.0345	<u>CO</u> 0.5654	<u>NOx</u> 0.0142	<u>CO2</u> 695	NMOG 0	NonMeth HC 0.0247	
<u>Odometer</u> <u>MPG</u> 4951 M 12.8			MFR Lab:	Bentley Motors	Limited	
MPG is 7.83 % hig				1 61 Tier 2 Cert G	Sasoline Sasoline	
I have validated the data in ac	cordance with	the requirements	of TP 730			
Validated By: 96			Date: <u>/</u>	0/13/10		

v101007 - d005\_

Page 2 of 2

Print Time 13-Oct-2010 11:51

EPAVDAEm101013103401

To: Jim Snyder/AA/USEPA/US@EPA[]

From: Ex. 7

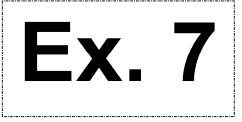
**Sent:** Thur 1/8/2009 7:40:49 PM

Subject: RE: Fw: Hybrid Vehicle Meeting in Early 2009

Hi Jim:

I will have to get back to you on the number of people. Not everyone is back to work yet in Germany so it will likely be the beginning of next week. If you have to act quickly to reserve a room, I would guess at about 5 people in our group and 1 pm to 4 pm on Thursday and 9 am to noon on Friday.

Thanks and best regards,



Volkswagen Group of America, Inc.



From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, January 08, 2009 2:24 PM

To: Ex. 7

Subject: RE: Fw: Hybrid Vehicle Meeting in Early 2009

Forgot to ask, do you know what time you will show up on Thursday and friday? So I can book a room. And roughly how many people?

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

Ex.	7

01/08/2009 02:11 PM

To Jim Snyder/AA/USEPA/US@EPA

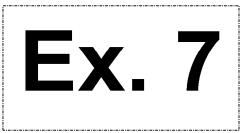
cc Linc Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA
Subject RE: Fw: Hybrid Vehicle Meeting in Early 2009

#### Hello Jim:

I have heard back from my colleagues regarding the timing of a meeting to discuss topics related to the certification and testing of hybrid vehicles. The proposal is the end of the week of March 2, 2009. More specifically, the afternoon of March 5 and the morning of March 6. I am not sure how you would feel about dividing the meeting over two days, particularly since the second day is a Friday. I realize that some of the staff may not be in on Friday.

Please let me know if this timeframe is workable.

Best regards,



Volkswagen Group of America, Inc.



From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, December 11, 2008 4:30 PM

To: **Ex. 7** 

Subject: Re: Fw: Hybrid Vehicle Meeting in Early 2009

**Ex. 7** We are certainly interested in having a meeting with them. It will be with me, Linc, Steve Healy, Chris Nevers, Dave Good and possibly Arvon Micham. I don't think we have any particular timing constraints yet.

Are they planning to visit the U.S. a particular week? Let me know and I will fit a meeting time into our schedules.

Jim Snyder Light-Duty Vehicle Group

2

Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

Linc Wehrly/AA/USEPA/US

12/09/2008 08:07 AM

To Jim Snyder/AA/USEPA/US@EPA

cc Stephen Healy/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA

Subject Fw: Hybrid Vehicle Meeting in Early 2009

Jim,

Please be sure to invite Steve and Chris to this meeting.

Thanks,

Linc

Linc Wehrly
Manager, Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4286
wehrly.linc@epa.gov

---- Forwarded by Linc Wehrly/AA/USEPA/US on 12/09/2008 08:06 AM -----

### Ex. 7

Received Date:

12/08/2008 04:55 PM Transmission Date:

12/08/2008 04:55:42 PM

To Linc Wehrly/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Jim

Snyder/AA/USEPA/US@EPA,

Fv '

CC

Subject Hybrid Vehicle Meeting in Early 2009

To all:

My colleagues in at our parent company in Germany have expressed an interest in meeting with the certification staff at EPA and ARB to discuss issues related to hybrid vehicle technology and certification. The following is a general list of the topics of interest:

- HEV Concepts/Technology
- Certification, Durability, Emissions Measurement
- Test Procedures
- Pressurized Fuel Tank
- Bench Testing
- Other

We would like to use the opportunity to share our thoughts on these topics and discuss the intent and direction of the agencies. At this time I would like to suggest meeting with each agency separately, in the mid-February to early-March time frame. My questions are 1.) whether the agencies are agreeable to such a meeting, 2.) who you would recommend participate from the agencies, and 3.) if there any particular time constraints during the suggested period.

I appreciate your consideration of this suggestion and look forward to hearing from you.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

To: Bruce Sdunek/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im

Snyder/AA/USEPA/US@EPA[]

From: Ex. 7
Sent: Thur 2/12/2009 1:19:43 PM

Subject: MY 2002 Bentley (Rolls Royce Test Group) Field Fix

CBI 2RRXV06.7TTC APP F02 R00.PDF

Ex. 7

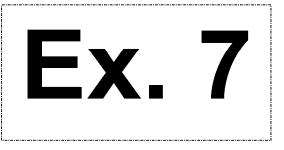
Hello Bruce and Jim,

I'm sending this to both of you since there hasn't been a formal announcement as to who is our EPA cert engineer.

The attachment contains a field fix for MY 2002 Bentley models in Rolls Royce test group 2RRXV06.7TTC. I would submit it through our Rolls Royce Verify account, but the Verify system only goes back to MY 2003 which makes that account useless. We did not have any Roll Royce test groups in MY 2003.

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,



Volkswagen Group of America, Inc.



### VOLKSWAGEN

#### GROUP OF AMERICA

Mr. David Good Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105 Leonard W. Kata Name
Manager – Emis. Cert. Title
EEO Department
248-754-4204 Phone
248-754-4207 Fax
leonard.kata@vw.com E-Mail

February 10, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326 PHONE +1 248 754 5000

Subject: Field Fix for 2002 Model Year Bentley Light Duty Vehicles
-Test Group 2RRXV06.7TTC and Evaporative Family
2RRXR0200E96

Dear Mr. Good.

Volkswagen of America Inc. ("VWoA") is the sole importer and distributor of Bentley motor cars in the United States, and submits this document on behalf of Bentley Motors Limited ("BML"), the manufacturer.

With this letter we wish to inform the agency of a field fix for the following test group.

Test Group 2RRXV06.7TTC Evaporative Family 2RRXR0200E96

Models Bentley Arnage, Bentley Arnage LWB

Transmission A4

The enclosed page describes Field Fix FF\_2B6.7TTC\_02\_09, which is an update to the Engine Control Module (ECM) calibration to prevent the limp home mode activation under certain cruise control circumstances. Details of the issue, analysis and resolution are described in the enclosure.

Also shown in the enclosure are the new Calibration Identification (CAL ID) and Calibration Verification Numbers (CVN) that will be used for the field fix on 2002 MY vehicles.

If you have any questions with regard to this information please contact our office in Auburn Hills at (248) 754-4215 or (248) 754-4224.

Sincerely,

Leonard W. Kata

Volkswagen Group of America, Inc.

Engineering and Environmental Office

Enclosure(s)

# Field Fix MY 2002

Subject:

Test Group:

2RRXV06.7TTC

Models:

Bentley Arnage

Bentley Arnage LWB

Transmission:

A4

RC / FF Nr.:

FF\_2B6.7TTC\_02\_09

Event:

Limp home mode activation during cruise control operation -

Diagnostic Trouble Code (DTC) P0606 is set as a part of

electronic throttle diagnosis.

Analysis:

When the vehicle is operated in cruise control mode, under

certain circumstances the actual torque exceeds the

permissible torque. This leads to limp home mode becoming

active and fault code P0606 is logged.

Activities:

The update to ECM calibration is to be used as necessary as a

field fix for the small number of 2002 MY vehicles that may

experience the above problem.

Model	Calibration Identification number (CAL ID)	Calibration Verification Number (CVN)
Bentley Arnage	PB106106PV PB110307PN PB110307PS PB106107PQ	DEC7A15C 6A5BAA03 E1F1A999 547B8213
Bentley Arnage LWB	PB106107PQ	547B8213

Impact on

**Emissions:** 

This change does not cause an impact on emissions.

Test Data:

Not applicable.

### Running Change/Field Fix Log

Model Year: 2002

Test Group: 2RRXV06.7TTC Evaporative Family: 2RRXR0200E96

Running Change / Field Fix Number	Description of Change / Reason	Date
FF_2B6.7TTC_01_08	Revised ECM calibration to resolve possible false detection of a very small leak P0456.	June 23, 2008
FF_2B6.7TTC_02_09	Revised ECM calibration to resolve cruise control concern.	February 03, 2009
	•	

Prefixes:

RC = Running Change

FF = Field Fix

RF = RC/FF

From: Ex. 7

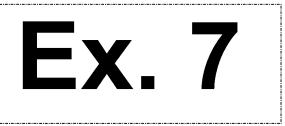
Sent: Wed 3/4/2009 11:23:26 PM Subject: RE: Volkswagen/Audi

Hi Jim:

Actually, I planned to do both. We just wrapped up our planning session here and I intend to send an electronic version. I still have to downsize it a bit, so it may be a little later tonight. I also plan to bring paper copies that you can use for note-taking.

Thanks for asking Karl to join.

See you tomorrow.



Volkswagen Group of America, Inc.

Ex. 7

----Original Message----

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov] Sent: Wednesday, March 04, 2009 5:51 PM

To: **Ex. 7** 

Subject: Re: Volkswagen/Audi

Ex. 7 are planning to bring copies of the presentation or can you send it to us ahead of time? It would be nice to have handouts to look at and take notes on during the presentation.

I also invited Karl  $\,$  Paulina from the lab. He'll be interested in the parts about HEV testing .

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division United States
Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

Ex. 7

To

Jim Snyder/AA/USEPA/US@EPA, Chris

03/04/2009 02:39 Nevers/AA/USEPA/US@EPA, David

PM Good/AA/USEPA/US@EPA, Linc

Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA, Ted Trimble/AA/USEPA/US@EPA

....

Ex. 7

Subject

Volkswagen/Audi

#### To all:

A few days ago I distributed a draft agenda for our meetings scheduled for Thursday (5.MAR) and Friday (6.MAR) of this week. We have finalized the agenda and I am now providing the final version. The agenda includes a discussion of durability procedures and OBD, so I have added Arvon Mitcham and Ted Trimble to the distribution. They were not on the EPA meeting invitation, but I hope that they are able to participate.

We will be forwarding some material shortly, that presents a preview of the upcoming Volkswagen and Audi hybrid technology, for your reference.

We will try our best to cover the bulk of this material on Thursday afternoon.

Best regards,

Ex. 7

Ex. 7

Volkswagen Group of America, Inc.

**Ex.** 7

[attachment "Agenda EPA Cert\_Final.ppt" deleted by Jim Snyder/AA/USEPA/US]

To: Jim Snyder/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; rvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; ed Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; arl Paulina/AA/USEPA/US@EPA[]

Ex. 7

From: Ex. 7

**Sent:** Thur 3/5/2009 3:34:08 AM

Subject: Volkswagen/Audi Presentation - 1 of 2

1 of 2

To all:

Attached are copies of the graphics that we intend to present during our meetings. There may be some slight variation in the order of presentation for the major topics.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

This Email message contained an attachment named EPA presentation\_sent\_final.zip which may be a computer program. This attached computer program could contain a computer virus which could cause harm to EPA's computers, network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced into the EPA network. EPA is deleting all computer program attachments sent from the Internet into the agency via Email.

If the message sender is known and the attachment was legitimate, you should contact the sender and request that they rename the file name extension and resend the Email with the renamed attachment. After receiving the revised Email, containing the renamed attachment, you can rename the file extension to its correct name.

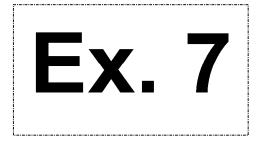
For further information, please contact the EPA Call Center at (866) 411-4EPA (4372). The TDD number is (866) 489-4900.

To:	David Good/AA	/USEPA/US@	EPA[]				
Cc:	Jim Snyder/AA/	USEPA/US@E	EPA;Chris Ne	vers/AA/USEPA	VUS@EPA;Lir	ıc	
Wehrly/AA	/USEPA/US@E	PA;Stephen H	ealy/AA/USE	PA/US@EPA;A	rvon		
	A/USEPA/US@		ble/AA/USEP	A/US@EPA;Ca	ırl	,	
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	JSEPA/US@EP						
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Trimble/A/	VUSEPA/US@E						
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<u>L</u>		···-					
From:	Ex. 7						
Sent:	Thur 3/5/2009 1						
Subject:	Volkswagen Au	di Presentatior	1				

Hi Dave:

As we just discussed, I have received a number of "undeliverable" messages from my transmission of the VW/Audi presentations last night. It appears that the file size is too large (even in pdf and zipped). I do not believe that renaming this file will solve the problem, so I am sending the presentations in a number of segments. I will include "1 of X" in the subject to preserve the order. As mentioned, I will also bring a number of printed copies.

Best regards,



Volkswagen Group of America, Inc.

Ex. 7

To: Jim Snyder/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; rvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; ed Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; arl Paulina/AA/USEPA/US@EPA[]

Cc: Ex. 7

Ex. 7

From: Ex. 7

**Sent:** Thur 3/5/2009 2:17:14 PM

Subject: VW/Audi Presentation March 5/6, 2009 ... 5 of 5

Bench Aging Procedure USA.pdf

PART 5 of 5

Ex. 7

Volkswagen Group of America, Inc.

**Ex.** 7

Cc: "Kolesa, Konrad, Dr. (I/EA-52)" [Konrad.Kolesa@AUDI.DE]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com]

From: "Thomas, Richard"

**Sent:** Thur 4/2/2009 7:10:53 PM

Subject: Volkswagen group Electronic Fund Transfer Log

20090402150346138.pdf

#### Hello Jim;

Here is the print out from our Volkswagen Accounts Payable group in Ajax, Canada where it shows that the transfer will take place tomorrow April 3, 2009. It lists each of the test groups which the payment covers. I mailed the Certification Fee Filing Form to Lt. Louis for the first five test groups on March 19, 2009 and the last ten test groups on April 1, 2009. That was April fools day so I hope it makes it. If anyone has any questions they may contact me directly.

Thanks and best regards, Richard E. Thomas VOLKSWAGEN GROUP OF AMERICA, INC. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO)

Phone: 248 754-4213 Fax: 248 754-4207

Richard.Thomas@VW.com

To: Willem VandenBroek/AA/USEPA/US@EPA[]

Cc: "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; im

Snyder/AA/USEPA/US@EPA[]

From: "Thomas, Richard"

Sent: Fri 4/3/2009 3:18:51 PM

Subject: RE: Cert Fee Issues #351 and 352

20090402150346138.pdf

Hello Bill;

I sent the attached e-mail to Jim Snyder yesterday, I hope he sent it to you before he left. I know he is not in the office today. Bottom line, all Volkswagen Group brands, Volkswagen, Audi, Bentley, Lamborghini and Bugatti are paid from our Volkswagen finance department electronically. The fee filing forms for all 15 test groups covered with today's payment were mailed to St. Louis on two separate dates, March 19 and April 1, 2009. If there are any further questions, please feel free to contact me directly.

Best regards,
Richard E. Thomas
VOLKSWAGEN GROUP OF AMERICA, INC.
3800 Hamlin Road
Auburn Hills, MI 48326
Engineering and Environmental Office (EEO)

Phone: 248 754-4213 Fax: 248 754-4207

Richard.Thomas@VW.com

----Original Message----

From: VandenBroek.Willem@epamail.epa.gov [mailto:VandenBroek.Willem@epamail.epa.gov]

Sent: Friday, April 03, 2009 10:38 AM

To: Thomas, Richard

Subject: Fw: Cert Fee Issues #351 and 352

#### Richard:

Following up on our conversation, I will process this as indicated below unless you say otherwise. Note that the audi can't be listed as paid until the fees process has received the fee filing form.

Bill

----- Forwarded by Willem VandenBroek/AA/USEPA/US on 04/03/2009 10:37 AM

"Ventre, Adam

M."

<adamventre@PQA. To

com> Willem

Sent by: VandenBroek/AA/USEPA/US@EPA

"Ventre, Adam co

M." "Burke, Chaffee"

<adamventre@PQA. <chaffeeburke@pqa.com>

com> Subject

Cert Fee Issues #351 and 352

Received Date: 04/03/2009 10:17

ΑM

Transmission

Date:

04/03/2009 10:17:50 AM

#### Bill-

We received an ACH payment for \$514,845 via Cashlink today. This is a Volkswagen payment that lists an Audi engine family names (AADXJ03.23UC) under Payment Related Information. We have not yet received FFF's for the Audi engine indicated on the payment. However, it appears that this payment could potentially resolve Cert Fee Issues #351 and #352 (Engine families: AVWXV02.5259, AVWXV02.5257, AVWXV02.5253, AVWXV02.5U35, and AADXV05.2LR8). Resolving these issues would account for \$171,615 of the payment. The remaining \$343,230 would be listed as a Payment no FFF issue. Please let us know if you would like us to handle this differently.

Thanks!

Adam Ventre Perrin Quarles Associates, Inc. (434) 979-3700 x 176

Subject: Volkswagen group Electronic Fund Transfer Log

Date: Thu, 2 Apr 2009 15:10:53 -0400

Message-ID: <A8A2B485FAC02340A4BF5F5129D1FE5113656A38@VWOAAHSXH001.vwoa.na.vwg>

From: "Thomas, Richard" < Richard. Thomas@vw.com>

To: <snyder.jim@epa.gov>

Cc: "Kolesa, Konrad, Dr. (I/EA-52)" <Konrad.Kolesa@AUDI.DE>, "Hart, Robert (VWoA)"

<Robert.Hart@vw.com>

Content-Type: multipart/mixed; boundary="----\_=\_NextPart\_002\_01C9B3C6.BE14813F"

X-MimeOLE: Produced By Microsoft Exchange V6.5

Content-class: urn:content-classes:message

MIME-Version: 1.0 X-MS-Has-Attach: yes X-MS-TNEF-Correlator: Thread-Topic: Volkswagen group Electronic Fund Transfer Log Thread-Index: AcmzxZePN09/dhDKTT+7EN0qq8fwXwAABNVA

### Hello Jim;

Here is the print out from our Volkswagen Accounts Payable group in Ajax, Canada where it shows that the transfer will take place tomorrow April 3, 2009. It lists each of the test groups which the payment covers. I mailed the Certification Fee Filing Form to Lt. Louis for the first five test groups on March 19, 2009 and the last ten test groups on April 1, 2009. That was April fools day so I hope it makes it. If anyone has any questions they may contact me directly.

Thanks and best regards, Richard E. Thomas VOLKSWAGEN GROUP OF AMERICA, INC. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO)

Phone: 248 754-4213 Fax: 248 754-4207

Richard.Thomas@VW.com

To: Linc Wehrly/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim

Snyder/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]

From: Ex. 7

**Sent:** Fri 4/10/2009 1:34:08 PM

Subject: Hybrid Warranty and Maintenance

To all:

FYI.

As a follow-up to our 2-day meeting last month regarding future HEV certification, I have submitted a document, through the VERIFY system, requesting review of the VW proposed HEV warranty coverage and maintenance intervals.

Best regards,

**Ex.** 7

Volkswagen Group of America, Inc.

Ex. 7

To: David Good/AA/USEPA/US@EPA[]

Cc: Jim Snyder/AA/USEPA/US@EPA;Tom Ball/AA/USEPA/US@EPA;Ross

Ruske/DC/USEPA/US@EPA[]; om Ball/AA/USEPA/US@EPA;Ross Ruske/DC/USEPA/US@EPA[]; oss Ruske/DC/USEPA/US@EPA[]

From: "Hennard, Mike"

**Sent:** Thur 4/16/2009 12:51:54 PM

Subject: RE: VW 2586 Recall Report - What 2003 models are covered?

Hello David:

I researched your question and found the following details regarding test group 3VWXV02.0223:

The Volkswagen Warranty Extension for catalytic converters does indeed cover all model vehicles in this 3VWXV02.0223 test group. The vehicles are divided into two distinct engine types, "AHV" for models Golf, Jetta, New Beetle (sedan) and engine type "BDC" which distinctly for the New Beetle Convertible.

I checked the VW Service Circular and the VW dealers were given this correct information. The VERR report submitted to EPA on November 09, 2007 only included the New Beetle Convertible as you stated. I will have the VERR corrected and re-submit VERR report to you immediately to assure EPA records are correct.

Thanks for finding this discrepancy.

Mike Hennard VWGoA - EEO

----Original Message-----

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]

Sent: Wednesday, April 15, 2009 5:27 PM

To: Hennard, Mike

Cc: Snyder.Jim@epamail.epa.gov; Ball.Tom@epamail.epa.gov;

Ruske.Ross@epamail.epa.gov

Subject: Re: VW 2586 Recall Report - What 2003 models are covered?

Mike,

The 2003 certificate for test group 3VWXV02.0223 covers Golf, Jetta, Jetta Wagon, New Beetle and New Beetle Convertible models. The certif was originally issued 4/25/02 and revised on 9/5/02, adding New Beetle Convertible models.

Do you know why the attached voluntary recall/warranty extension to 100K only applies to 2003 New Beetle Convertible models? It looks like a typo and it should actually cover 2003 Golf, Jetta, Jetta Wagon, New Beetle and New Beetle Convertible models.

Please advise.

Thanks	

VW 2586 Recall Report

Michael Stephens

to:

David Good, Ross Ruske

04/15/2009 04:33 PM

Dave,

Attached is the scanned file of the VW Catalytic Converter extended warranty Recall Report. It clearly shows that for 2003 it included only the New Beetle Convertible and not the Jetta.

(See attached file: Volkswagen 2586 Recall Report.pdf)

Sincerely,
Michael Stephens
EG&G Technical Services, Inc.
E-mail: stephens.michael@epa.gov

Phone: 734-214-4879 Fax: 734-214-4676 To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: Ex. 7

From: Ex. 7

Sent: Fri 4/24/2009 T2:48:29 PM

Subject: FW: Pending Fees for Volkswagen Group Test Groups

Hello Jim;

Thanks for the call, I must have just left the office when you called. As you can see from the following information I am still waiting for the ten fee filing forms to catch up to the \$343,230 moneys we transferred on April 3, 2009. Bill has now gotten the forms I sent him and I am waiting for a response. If you discover anything, please let me know.

Thanks, **Ex. 7** 

Ex. 7

It's a good thing you're on top of this. I can't speculate on what exactly happened, but the forms you mailed to St. Louis evidently didn't make it to our contractor (the Bank is supposed to overnight them to them and to EPA in D.C.; through a kind of bureaucratic genius, I, who am supposed to problem shoot, never see them). This explains the lack of an acknowledgment. Can you send them to me, and I'll take care of it? In general, submitting the forms by pay.gov is foolproof (even if payment is done by some other method) as is sending them to fees@EPA.gov.

Thanks,

Bill

Ex. 7

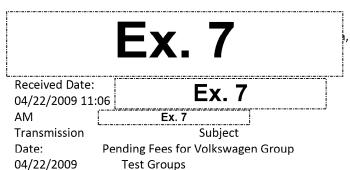
@ To

Willem

Sent by: VandenBroek/AA/USEPA/US@EPA

Ex. 7 cc

1



11:06:28 AM

#### Hello Bill;

Here is a listing of the last ten 2010 Audi test groups that were awaiting the fee filing forms to catch up with our electronic payment on April 3, 2009. The fee filing forms were mailed on April 1, 2009. If you would; please determine if these test groups are noted as being paid up. I have not received any email confirmation of their payment.

AADXT03.03LD AADXT04.23UD AADXV04.2365 AADXV05.2385 AADXV02.03UB AADXV02.03UA AADXV02.03PA AADXV03.03UF AADXJ03.23UC

Thank you,		
Ex. 7		
VOLKSWAGEN	I GROUP OF AM	ERICA, INC.
	X.	7

From: "Hart, Robert (VWoA)"

Sent: Thur 5/28/2009 2:25:26 PM

Subject: Upcoming Test Waiver Requests

mailto:robert.hart@vw.com

Hello Jim,

I took a quick look at the files.

There are two 2.0L turbo test groups with a total of 6 vehicle configurations that I will be submitting in the very near future.

Best regards,

Bob

Robert Hart

**Emissions & Regulatory Analyst** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

mailto:robert.hart@vw.com

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]

From: "Rodgers, William"

**Sent:** Fri 5/29/2009 2:10:33 PM

**Subject:** VW Test Group AVWXV02.5U35

william.rodgers@vw.com

Hello Jim,

We received your confirmatory test waiver for VID VW35100056/10 (manual trans. Configuration 0). Thanks for your help.

As a heads, we have to correct Section 12 vehicle weights in the application recently submitted for this test group so it matches the verify vehicle data.

You should get a revised application and the pending confirmatory test supplemental information for VID VW35100052/10 (automatic trans. configuration 3) in the next few days.

Best regards,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. 3800 Hamlin Rd.

Auburn Hills, MI 48436

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

**From:** "Hart, Robert (VWoA)" **Sent:** Mon 7/6/2009 5:33:18 PM

Subject: FW: MY 2010 Conditional OBD Approval

AAD-OBD-AADXT03.03LD E-09-148.pdf

mailto:robert.hart@vw.com

Hello Jim,

I forgot to Cc: you on this.

Best regards,

**Bob Hart** 

From: Hart, Robert (VWoA)

Sent: Monday, July 06, 2009 8:54 AM To: 'Peavyhouse.Robert@epamail.epa.gov'

Cc: Thomas, Suanne

Subject: MY 2010 Conditional OBD Approval

Importance: High

Hello Bob,

This is advance notice that I will be submitting an application for test group AADXT03.03LD today with a conditional OBD approval from CARB.

The conditional approval is related to the ARB's OBD Demonstration reporting requirement. Please see the attachment for details.

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,

Bob Hart

Robert Hart

**Emissions & Regulatory Analyst** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

mailto:robert.hart@vw.com





03:05

07/01/2009

# Air Resources Board

Mary D. Nichols, Chairman 9480 Telstar Avenue, Sulte 4 El Monte, California 91731 www.arb.ca.gov



July 1, 2009

Reference No. E-09-148

Dr. Christoph Kohnen General Manager Engineering and Environmental Office Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Post-It <sup>a</sup> Fax Note 7671	Date 7/1 / 29 pages 5
TO VW	From CAPB
Co./Dept.	Co.
Phone #	Phone #
Fax# 248-754-4207	FAX# (14-575-7012

SUBJECT: Conditional Approval and Applicable Fines of Volkswagen's (VW) On-Board Diagnostic II (OBD II) System for 2010 Model Year Test Group AADXT03.03LD

Dear Mr. Kohnen:

The Air Resources Board's (ARB) Engineering Studies Branch has received the OBD II system description submitted by VW for the 2010 model year test group listed above. Representations made in the application indicate that the system is compliant with the OBD II regulation with the exception of exhaust gas recirculation (EGR) cooler circulation pump monitoring, EGR cooling thermostat monitoring, fuel quantity and timing monitoring, cold start emission reduction strategy monitoring, emissions increasing-auxiliary emission control device (EI-AECD) tracking, diesel oxidation catalyst (DOC) monitoring, and diesel particulate filter (DPF) monitoring. However, because discrepancies have been found in the OBD II demonstration data representing the test group identified as required by section (h)(1) of the OBD II regulation, ARB can only issue a conditional approval of the system design. The staff has determined that VW meets the factors that allow OBD II systems to be certified with deficiencies. As stated in the email sent by Ms. Suanne Thomas dated July 1, 2009, to Mr. Peter Ho, VW has agreed to pay fines for the third through seventh deficiencies as a condition of certification. Therefore, ARB approves the 2010 model year system with seven deficiencies. While not considered deficient, staff has concerns regarding urea pressure sensor rationality, and selective catalytic reduction (SCR) monitoring. Details of the deficiencies and concerns are noted below. Lastly, upon staff's review and approval of the demonstration data, the conditional status will be removed.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple weys you can reduce demand and cut your energy costs, see our website: http://www.arb.ca.gov.

California Environmental Protection Agency

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### EGR Cooler Circulation Pump Monitor Deficiency

VW's EGR cooling system includes a water pump that is dedicated to the EGR cooling circuit. While the pump is monitored for circuit malfunctions, the OBD II system does not monitor the pump for proper functional response to computer commands as required by the OBD II regulation. As such, the EGR cooler circulation pump monitor is considered deficient.

### EGR Thermostat Monitor Deficiency

VW's EGR cooling system includes a thermostat that is dedicated to the EGR cooling circuit. If the thermostat were to stay in a stuck open position, coolant would not be properly regulated through the cooler and could cause fouling and failure of the EGR cooler. VW contends that the EGR cooling efficiency monitor would pick up the fault and turn on the MIL when fouling causes the system to be ineffective. However, this would lead to unnecessary failures of the EGR cooler and would hinder a technician's ability to make effective repairs. The OBD II system does not monitor the thermostat for proper function and is therefore considered deficient.

# Fuel Quantity and Timing Monitor Deficiency

For the 2010 model year, VW has introduced a new monitoring strategy to detect fuel quantity and timing malfunctions. There are a number of issues with this monitor and the demonstration testing. First, this strategy required five Unified test cycles to detect a malfunction, which are more cycles than permitted by the OBD regulation. Second, due to an error in the new monitoring strategy the monitor is only able to detect quantity and timing malfunctions that result in reduced quantity. High quantity malfunctions would still rely on the old zero fuel calibration strategy which requires approximately 1000 miles of driving with the malfunction present to detect a failure. Lastly, high quantity demonstration testing was not completed showing fault detection at the required emission levels because of the risk of engine damage. Without further justification, staff does not accept VW's claim that this test cannot be conducted without damaging the engine. For the reasons cited above, this monitor is considered deficient.

# Cold Start Emission Reduction Strategy Monitoring Deficiency

VW has indicated that a cold start strategy is used on this vehicle, and each component involved in the cold start phase is individually monitored. In a presentation to ARB, VW showed monitors for the components involved in cold start. However, it was unclear how the components were operated during cold start and whether the OBD system will robustly verify the desired effect is achieved during cold start operation. VW has not

shown that cold start monitoring requirements are met. Therefore the OBD II system is considered deficient for cold start monitoring.

### **DOC Monitoring Deficiency**

Section (f)(1.2.3)(B) of the regulation requires malfunction detection when the catalyst is unable to generate the necessary feedgas constituents for proper SCR system operation. In previous presentations to ARB, VW has claimed that separate monitoring of feedgas generation is not possible. Instead, VW has claimed this failure mode should be covered by monitoring for non-methane hydrocarbon (NMHC) conversion. However, ARB is not fully convinced that deterioration of feedgas generation and NMHC conversion are directly correlated. Therefore, staff cannot conclude whether the NMHC conversion efficiency monitor will reliably detect a DOC malfunction when the catalyst is unable to generate the feedgas or whether further DOC deterioration will be necessary to fail the NMHC conversion monitor. The OBD II system is therefore deficient for monitoring of the DOC feedgas capability.

### **DPF Monitoring Deficiency**

VW's DPF has a catalyzed coating to help particulate oxidation and extend filter durability. VW has claimed they do not rely on the catalyzed coating for NMHC conversion and monitoring for this function is not possible due to the negligible amount of exothermic reaction in this part. Despite this claim, emission test results with an uncoated DPF show a significant increase in NMHC emissions, though emissions remain below the OBD threshold of three times the emission standard. Section (f)(9.2.4) of the regulation allows for the use of a functional monitor in this case; however, VW's OBD II system does not have this monitor and is considered deficient.

### EI-AECD Tracking Deficiency

For 2010 model year diesel vehicles, manufacturers are required to track and report EI-AECD activity as specified in section (g)(6.2) of the regulation. VW has identified EI-AECDs that should be tracked and reported. However, VW has not fully implemented the software to properly track and report the data to a generic scan tool. Consequently, no EI-AECD data will be reported to a scantool. Therefore, the OBD II system is considered deficient for failing to meet EI-AECD tracking requirements. Furthermore, to resolve this deficiency for future model years and so staff can confirm VW's determination on the EI-AECDs that need to be tracked and reported, VW is required to fully document its AECDs and EI-AECDs as required by section (i)(2.15) of the regulation.

# Conditional Approval and Fuel System Demonstration Concern

The OBD II system detects a malfunction for fuel pressure deviation when the difference between commanded and actual fuel pressure reaches a calibrated threshold. When a malfunction is detected, engine torque is reduced to protect the engine and it is not possible to drive the emission test cycle. In order to determine the emission levels when a fault is detected, a malfunction is induced to simulate a worst performing acceptable system (i.e., a barely passing system) via software modification. Specifically, the fuel pressure setpoint was altered in the engine control module (ECM) to simulate engine operation with a malfunction that results in higher or lower than normal pressures. Due to the ability of the fuel system to control to the new setpoint commanded by the ECM, VW claimed there was no resultant deviation measured between the commanded and actual fuel pressures. Staff is concerned that the emission data are not representative of the emission levels from a system that is operating near the malfunction criteria. Therefore staff cannot conclude the emission thresholds are satisfied based on these data. In order to remove the conditional approval VW is required to perform additional tests that result in a deviation near the threshold. Additionally, this chosen method of fault simulation is acceptable for the 2010 model year. However, for future model year approval, VW is required to demonstrate that the computer modifications yield equivalent results to hardware modifications. Further, VW is required to make this demonstration in all cases where computer modifications are used in lieu of hardware modifications.

# SCR Time to Closed Loop Concern

Section (f)(2.2.3)(D) of the OBD II regulation requires the OBD II system to detect a malfunction when the SCR system fails to enter closed loop feedback control within a manufacturer's specified time interval. In lieu of monitoring the SCR system for time to enter closed loop, VW is individually monitoring all the components and parameters that are used as inputs to closed loop control. In order to enter closed loop control, VW waits for temperature sensor T6 to exceed 100°C. Monitoring for this temperature occurs after a specific amount of heat has been put into the exhaust system. If the temperature has not been reached after this condition, a malfunction is detected. VW has claimed the monitor is calibrated to a worse case scenario of a drive cycle at continuous idle at -7°C ambient temperature. Staff has concerns this monitor is calibrated too conservatively and may take longer than necessary to detect a malfunction under less than worst case scenarios.

## Urea Pressure Sensor Rationality Monitoring Concern

Staff has concerns that the urea sensor out of range high monitoring threshold was calibrated too high (i.e., 4.86V on a 5V sensor) and will only detect extreme deterioration. In a presentation to ARB, VW showed that frozen urea can cause a rise in measured pressure causing the sensor to read a high voltage value under extreme cold ambient conditions. Staff understands VW is considering a two threshold strategy for future model years to enhance the rationality check and address staff's concerns.

Under the deficiency provisions of section (k) of the OBD II regulation, VW is subject to fines of \$150 per vehicle for each vehicle produced for sale in California from the above test group. Such fines are to be paid to the State Treasurer for deposit in the Air Pollution Control Fund. The total fines that VW will be required to pay will be based on production and distribution records provided by VW for the 2010 model year. VW could limit its total liability should it elect to implement a running change correcting one or more of these deficiencies during the model year. Vehicles produced subsequent to such changes would be subject to lesser fines.

Should you have questions or comments regarding this letter, please have your staff contact Peter Ho at (626) 459-4392.

Sincerely,

Steve Albu, Assistant Chief

Mobile Source Control Division

cc: Peter Ho

**Engineering Evaluation Section** 

Muhael J. Rogert for SGA

To: Robert Peavyhouse/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im

Snyder/AA/USEPA/US@EPA[]

From: "Hart, Robert (VWoA)"

Sent: Wed 7/8/2009 9:15:30 PM

Subject: MY 2010 Conditional OBD Approval for Test Group AVWXV02.0U5N

AVW-OBD-AVWXV02.0U5N- E-09-150.pdf

mailto:robert.hart@vw.com

Hello Bob and Jim,

This is advance notice that I will be submitting an application for test group AVWXV02.0U5N today with a conditional OBD approval from CARB.

The conditional approval is related to the ARB's OBD Demonstration reporting requirement. Please see the attachment for details.

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,

**Bob Hart** 

Robert Hart

**Emissions & Regulatory Analyst** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

mailto:robert.hart@vw.com





# Air Resources Board

Mary D. Nichols, Chairman 9480 Telstar Avenue, Suite 4 El Monte, California 91731 www.arb.ca.gov



July 3, 2009

Secretary for

Environmental Protection

Reference No. E-09-150

Dr. Christoph Kohnen General Manager Engineering and Environmental Office Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Post-it* Fax Note 7671	Date 7/3 / 09 V of 4	
TO VW	From CARR	
Co./Dept.	Co.	
Phono #	Phone #	
Fax # 248-754-4207	Fax# (26-575-7012	

SUBJECT: Conditional Approval and Applicable Fines for Volkswagen's (VW) On-Board Diagnostics II (OBD II) System Design for 2010 Model Year Test Group AVWXV02.035N

Dear Dr. Kohnen:

The Air Resources Board's (ARB) Engineering Studies Branch has received the OBD II system description submitted by VW for the 2010 model year test group listed above. Representations made in the application indicate that, with the exception of exhaust gas recirculation (EGR) monitoring, fuel quantity and timing monitoring and diesel particulate filter (DPF) monitoring, the system meets the requirements of the OBD II regulation. However, because staff has not completed a review of the submitted OBD II demonstration data representing the test group identified above as required by section (h)(1) of the OBD II regulation, ARB can only issue a conditional approval of the system design. Therefore, ARB conditionally approves the 2010 model year system design for the above test group with three deficiencies. As stated in the email sent by Ms. Suanne Thomas dated July 3, 2009, to Mr. Peter Ho, VW has agreed to pay fines for the third deficiency as a condition of certification. While not considered deficient, staff also has concerns regarding NOx adsorber time to closed loop monitoring, fuel pressure monitoring, and emissions increasing-auxiliary emission control device (EI-AECD) tracking. Details regarding the deficiencies and concerns are discussed below. Upon completion of staff's review and approval of the demonstration data, the conditional status will be removed.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple weys you can reduce demand and cut your energy costs, see our website: http://www.arb.ca.gov.

California Environmental Protection Agency

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### **DPF Monitoring Deficiency**

VW's DPF has a catalyzed coating to help particulate oxidation and extend filter durability. VW has claimed they do not rely on the catalyzed coating for NMHC conversion and monitoring for this function is not possible due to the negligible amount of exothermic reaction in this part. VW has provided emission data from a test with an uncoated diesel oxidation catalyst and DPF, and emissions were below the OBD threshold of three times the emission standard. Section (f)(9.2.4) of the regulation allows for the use of a functional monitor in this case; however, VW's OBD II system does not have this monitor and is considered deficient.

### EGR Monitoring Deficiency

Section (f)(6.2.3) requires the OBD II system to detect slow response malfunctions under both increasing and decreasing EGR flow rates. VW monitors for proper EGR valve closing by comparing a modeled air mass flow to actual air mass flow. The monitor is run under fuel cut conditions where EGR is shut off quickly. If the EGR system were slow to respond when the valve is commanded closed, this would have a significant influence on measured airflow and cause a fault to be detected. However the fuel cut diagnostic would not detect slow EGR response in the increasing direction (e.g., when commanding the valve open). In addition to the slow response issues discussed above, staff has concerns regarding EGR low and high flow monitoring, which are required to be monitored continuously. Non-continuous operation may be approved if VW demonstrates that disablement is limited to conditions where a properly operating EGR system cannot be distinguished from a malfunctioning EGR system and the disablement interval is limited only to that which is technically necessary. VW's high and low flow monitors are not monitored continuously. While VW has stated the disablements are necessary for robust detection of EGR malfunctions. VW has not provided data to justify the disablements. Considering these issues regarding EGR monitoring, the OBD II system is deficient for EGR monitoring. To remove this deficiency, VW will be required to monitor and detect slow response in both directions, and submit data to justify disable conditions for the EGR high and low flow monitors.

## Fuel Quantity and Timing Monitor Deficiency

For the 2010 model year, VW has introduced a new monitoring strategy to detect fuel quantity and timing malfunctions. This strategy required six Federal Test Procedure cycles to detect a malfunction, which are more cycles than permitted by the OBD regulation. VW has stated it may be possible to detect the malfunction on as few as two Unified cycles due to the increased amount of fuel cut time over the test cycle; however, VW has not yet conducted testing over the Unified cycle. The quantity and timing

monitor is therefore considered deficient because it takes too many test cycles to detect the malfunction. The deficiency will be removed if VW demonstrates detection in two Unified cycles.

## NOx Adsorber Time to Closed Loop Concern

Section (f)(8.2.3)(A) of the OBD II regulation requires the OBD II system to detect a malfunction when the NOx adsorber system falls to enter feedback control within a manufacturer's specified time interval. In lieu of monitoring the SCR system for time to enter closed loop, VW is individually monitoring all the components and parameters that are used as inputs to closed loop control. In order to enter closed loop control, VW waits for the temperature sensor upstream of the NOx adsorber to exceed 230°C. Monitoring for the temperature sensor occurs after a modeled temperature of 300°C is reached. If the temperature sensor does not read 230°C after the model has reached 300°C, then a malfunction will be detected. VW has provided some data to show that the modeled temperature will exceed 300°C under both city and highway driving conditions. However, based on these limited data, staff cannot fully assess how long after start a properly functioning system reaches 230°C and how long the monitor takes to detect a malfunction. Staff has concerns this monitor may require more time than necessary to detect a malfunction. To avoid a future deficiency determination, VW should explain how the model is calculated, why the model was calibrated to 300°C. and provide data showing the performance of the monitor following an engine start.

## Fuel Pressure Monitoring Concern

Fuel pressure monitoring requires a fuel temperature of greater than -20°C to be enabled. The only diagnostic for fuel temperature occurs at cold start sensing a shift from other temperature sensors of ±30°C. Staff has concerns that a sensor stuck below -20°C at cold soak temperatures below 10°C could cause fuel system pressure monitoring to be disabled without notification to the driver or a technician. VW has suggested it can lower the fuel pressure enable temperature to -27°C to mitigate staff's concerns. Staff accepts this proposal. However, as diesel diagnostic systems are refined, staff may require additional rationality monitoring (e.g., a monitor that verifies the sensor warms up) of the fuel temperature sensor.

### El-AECD Tracking Concern

For 2010 model year diesel vehicles, manufacturers are required to track and report EI-AECD activity as specified in section (g)(6.2) of the regulation. VW has assessed its AECDs and has not identified any EI-AECDs that should be tracked and reported. Therefore, no EI-AECDs are reported to a generic scan tool. Due to documentation

issues, staff has concerns that EI-AECDs which require tracking may exist in VW's system and have not been identified. For example, staff is concerned there may be conditions where NOx adsorber regeneration will not occur (e.g., due to high temperature or load) and vehicle operation under such conditions would require tracking. To resolve this concern and so staff can confirm VW's determination on the EI-AECDs that need to be tracked and reported, VW is required to fully document its AECDs and EI-AECDs as required by section (i)(2.15) of the regulation.

Under the deficiency provisions of section (k) of the OBD II regulation, VW is subject to fines of \$50 per vehicle for each vehicle produced for sale in California from the above test group. Such fines are to be paid to the State Treasurer for deposit in the Air Pollution Control Fund. The total fines that VW will be required to pay will be based on production and distribution records provided by VW for the 2010 model year. VW could limit its total liability should it elect to implement a running change correcting one or more of these deficiencies during the model year. Vehicles produced subsequent to such changes would be subject to lesser fines.

Should you have questions or comments regarding this letter, please have your staff contact Peter Ho at (626) 459-4392.

for Steere Albu

Sincerely.

Steve Albu, Assistant Chief

Mobile Source Control Division

cc: Peter Ho

Engineering Evaluation Section

From: "Hart, Robert (VWoA)"

Sent: Tue 7/21/2009 2:41:06 PM

Subject: MY 2010 Bentley Continental GTC Running Change Letter

mailto:robert.hart@vw.com

Hello Jim,

I submitted the attached running change letter through the Verify system.

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,

**Bob Hart** 

Robert Hart

**Emissions & Regulatory Analyst** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

mailto:robert.hart@vw.com

To: Vincent Mazaitis/AA/USEPA/US@EPA[]
Cc: Jim Snyder/AA/USEPA/US@EPA[]

**From:** "Hart, Robert (VWoA)" **Sent:** Mon 7/27/2009 6:36:46 PM

Subject: RE: A3UC-CAF

Thanks for the info Vince.

Best regards,

**Bob Hart** 

----Original Message-----

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov] Sent: Monday, July 27, 2009 2:03 PM

To: Hart, Robert (VWoA) Subject: Fw: A3UC-CAF

Let's try this again!

----- Forwarded by Vincent Mazaitis/AA/USEPA/US on 07/27/2009 02:01 PM

From: Vincent Mazaitis/AA/USEPA/US

To: roberthart@vw.com

Cc: Jim Snyder/AA/USEPA/US@EPA, Ben Haynes/AA/USEPA/US@EPA, Vanamburg.David@epamail.epa.gov

Date: 07/27/2009 01:04 PM

Subject: A3UC-CAF

Hello Bob,

the subject vehicle is scheduled to test on Thursday 7/30/09. I will talk with the lab on Wednesday to try to establish a time. I'll contact you as soon as I know when to expect the vehicle to be tested.

If you have any questions or concerns, please contact Jim Snyder or me.

Thanks,

Vince Mazaitis (734) 214-4864

Cc: David Good/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Joel

Ball/AA/USEPA/US@EPA[]; obert Peavyhouse/AA/USEPA/US@EPA;Joel

Ball/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA[]

From: "Thomas, Richard"

**Sent:** Tue 8/18/2009 1:36:30 PM

Subject: RE: Help with the Cash for clunkers -- Please respond with answers to our questions

or the missing data in the attached spread sheet: 2009 Audi A6 w/FWD 3.1L

Dec 08 Notice EPA gen labels.pdf

Hello Jim;

The 2009 Audi A6 models were as follows: 2009 Audi A6 quattro and A6 Avant quattro (AWD) were certified in both 4.2L V8 and 3.0L supercharged V6 test groups and labeled for fuel economy, at that time, in CEFIS. We did certify a 2009 3.1L naturally aspirated V6 for the Audi A6 front wheel drive with CVT transmission. This 3.1L test group was issued a certificate of conformity in CEFIS, late in the season. Because none of the certification data existed in Verify and EPA switched to use the Verify system for labeling, it was not processed in the Verify system, but rather a letter of self approved label values was sent to Dave Good as he requested, copy attached. The values are listed on the attachment to the December 15, 2008 letter.

There are other 3.2L V6 models that exist in 2009, these were A4 quattro and A5 quattro models but no 3.2L Audi A6. The 2010 Audi A6 3.2L with (front) CVT transmission was labeled and certified in Verify.

Please call me with your questions.

Best regards,

Richard E. Thomas
VOLKSWAGEN GROUP OF AMERICA, INC.
3800 Hamlin Road
Auburn Hills, MI48326
Engineering and Environmental Office (EEO)

Phone: 248 754-4213 Fax: 248 754-4207 Richard.Thomas@VW.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, August 17, 2009 5:37 PM

To: Thomas, Richard

Cc: Good.David@epamail.epa.gov; Peavyhouse.Robert@epamail.epa.gov; Ball.Joel@epamail.epa.gov Subject: Help with the Cash for clunkers -- Please respond with answers to our questions or the missing data in the attached spread sheet: 2009 Audi A6 w/FWD 3.1L

Okay I looked at our database and Cars.gov site again. For 2009, the only A6s listed are the A6 Quattro and A6 Quattro Avant. These are AWD and listed with a 3.0L(super charged) or 4.2L. V8.

There is no data for any FWD A6 models. There is no data for any 3.1L. Also, he magazines say there is a 3.2L for 2009 which is confusing. Did we get data on these? If not please supply.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

# **VOLKSWAGEN**

#### **GROUP OF AMERICA**

Mr. Dave Good Certification & Compliance Division U.S. Environmental Protection Agency 2000 Traverwood Ann Arbor, Michigan 48105 Richard E. Thomas Jr. NAME Certification Strategist Time

EEO DEPARTMENT

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD AUBURN HILLS, MI 48326

PHONE +1 248 754 5000

248 754 4213 PHONE 248 754 4207 FAX

Richard.Thomas@VW.com E-MAIL

December 15, 2008 DATE

Subject: Notice of Self-Approval of 2009 Audi General Label Fuel Economy Values

Dear Mr. Good,

In accordance with 40 CFR Part 600, we are notifying EPA of the Self-Approval of 2009 model year general fuel economy label values for the following models:

Audi A6 quattro (3.0L) Audi A6 Avant quattro (3.0L) Audi Q5 (3.2L) Audi A6 (3.1L)

The first three models listed, use the full 5 cycle test method while the Audi A6 (3.1L) uses the derived 5-cycle method. All the values are contained in the following attachment.

If you require additional information or have any questions please contact me directly at (248) 754-4213.

Sincerely,

Richard E. Thomas Jr.

Engineering and Environmental Office

attachments

# 2009 AUDI FUEL ECONOMY LABEL / FUEL ECONOMY GUIDE INFORMATION

Gas Guzzler Tax \$														
Gas Guzzler FE (MPG)														
EMENT SES HWY G)	21-31	21-31	22-32	19-27										
ACHIEVEMENT RANGES CITY HWY (MPG)	14-22	14-22	14-22	14-22										
ESTIMATED ANNUAL FUEL COST	3,070 P	3,070 P	3,070 P	3,225 P										
COMB (MPG)	21	21	21	20	***************************************									
LABEL CITY/HWY (MPG)	26	26	27	23										
CITY (MI	18	18	18	18										
GUIDE CAR CLASS	Midsize Cars	Midsize Wagon	Midsize Cars	Sport Utility Vehicles 4WD										
BASIC ENGINE CID / LITER	183 / 3.0	183/3.0	191/3.1	194 / 3.2										
TRANS	9S	Se	AV	Se										
MODEL	A6 quattro	A6 Avant quattro	A6	Q5										

2009 Fuel prices: P = Premium Unleaded Gasoline \ \$4.30 = unit price per gallon

R. E. Thomas Engineering and Environmental Office 12/15/2008 9:05:28 AM

To: "Hopson, Janet L." [hopsonjl@ornl.gov]

Jim Snyder/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA[]; avid Cc:

Good/AA/USEPA/US@EPA[] From: "Thomas, Richard"

Sent: Thur 8/20/2009 6:47:22 PM

Subject: RE: Please add 2009 Audi A6 3.1L Auto(AV) to www.fueleconomy.gov and cars.gov if

possible [Need unadj city/hwy/comb mpg values]

Audi A6 3.1L 2009 FE.pdf

Hello Janet;

The unadjusted label values for this 3.1L V6 2009 Audi A6 with CVT transmission is: 22.9000 city; 37.3000 highway; 27.7148. Please see the Verify printout index 45 (attached) from my attempt to input it into the system. If you have any questions please feel free to call me.

Thanks, Richard E. Thomas VOLKSWAGEN GROUP OF AMERICA, INC. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO) Phone: 248 754-4213

Fax: 248 754-4207 Richard.Thomas@VW.com

----Original Message-----

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]

Sent: Thursday, August 20, 2009 12:00 PM

To: Thomas, Richard

Cc: Hopson, Janet L.; Snyder.Jim@epamail.epa.gov Subject: RE: Please add 2009 Audi A6 3.1L Auto(AV) to

www.fueleconomy.gov and cars.gov if possible [Need unadj city/hwy/comb

mpg values]

Richard,

Please send Janet & all of us the unadjusted city, hwy and combined mpg values for this vehicle.

Thanks

From: "Hopson, Janet L." <hopsonjl@ornl.gov>

To: David Good/AA/USEPA/US@EPA Date: 08/20/2009 10:45 AM

Subject: RE: Please add 2009 Audi A6 3.1L Auto(AV) to

www.fueleconomy.gov and cars.gov if possible

We'll fix this. Any chance we could get the unadjusted numbers?

Janet

----Original Message-----

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]

Sent: Thursday, August 20, 2009 10:39 AM

To: Hopson, Janet L.

Cc: Li, Jia; Snyder.Jim@epamail.epa.gov; richard.thomas@vw.com

Subject: Please add 2009 Audi A6 3.1L Auto(AV) to www.fueleconomy.gov

and cars.gov if possible

Janet,

Here's one which slipped thru the cracks. The data was partially in our old CFEIS data base and partially in our new Verify data base. If possible can you put it on the web?

[Note: The other A6 and Q5 models in the pdf should already be on the web.]

**Thanks** 

Dave

---- Forwarded by David Good/AA/USEPA/US on 08/20/2009 10:32 AM ----

From: Debra Piper/AA/USEPA/US

To: David Good/AA/USEPA/US@EPA

Date: 08/20/2009 08:44 AM

Subject: Scan of chart for VW

(See attached file: Volkswagon Economy Guide.pdf)

From: "Hart, Robert (VWoA)"

Sent: Tue 10/6/2009 6:33:10 PM

Subject: VW Group: Cold NMHC Phase In

93PA sec 01-15 update 2.pdf 93UA sec 01-15 update 2.pdf 93UB sec 1-15 update 2.pdf CommSection 16 2009 update 2.pdf mailto:robert.hart@vw.com

Hello Jim,

The attachments contain the application/Common Sections pages that I am going to add to the related applications and common section for MY 2009. I will be adding similar pages to the 2010 application updates.

Best regards,

Bob Hart

Robert Hart

**Emissions & Regulatory Analyst** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

Section 5	Pg. 1	Test Group Description	Engine Code	R.CH-No.:	Revision Date
Test Group		9ADXV02.03PA	all		09-28-2009

### 5.1 Test Group Description

Test Group Name 9ADXV02.03PA
Summary Sheet Number 640T2-04
Engine displacements covered 2.0 liters
Arrangement and number of cylinders 1.4

Arrangement and number of cylinders I 4
Vehicle class (es) covered LDV

Federal Emissions Standards Class Tier 2 BIN 2

California Emissions Standards Class LEV II SULEV / Zero EVAP

(Qualifies as PZEV)

### 5.2 Test Group Emission Standards

Please refer to CFEIS Summary sheet included in Section 7 for applicable emission standards.

### 5.3 Test Group Cold NMHC Emission Standards

In accordance with §86.1811-10, all vehicles of this test group are part of the Cold NMHC phase in and are certified to fulfill the following family emission limits (FEL):

Certification FEL = 0.3 g/mi

Interim in-use FEL = 0.4 g/mi (MY 2009, 2010, 2011, 2012)

Section 5	Pg. 2	Test Group Description	Engine Code	R.CH-No.:	Revision Date
Test Group		9ADXV02.03UA	all		09-28-2009

### 5.3 Test Group Cold NMHC Emission Standards

In accordance with §86.1811-10, the following vehicles of this test group are part of the Cold NMHC phase in and are certified to fulfill the following family emission limits (FEL):

Certification FEL = 0.3 g/mi

Interim in-use FEL = 0.4 g/mi (MY 2009, 2010, 2011, 2012)

Model	Engine Code	Transmission
А3	CCTA	DQ250-6F
А3	CCTA	MQ350-6F
A3 quattro	CCTA	DQ250-6A
TT Coupe quattro	CCTA	DQ250-6AT
TT Roadster quattro	CCTA	DQ250-6AT
TTS Coupe	CDMA	DQ250-6AS
TTS Roadster	CDMA	DQ250-6AS
Eos	CCTA	DQ250-6F
Eos	CCTA	MQ350-6F
Jetta	CCTA	DQ250-6F
Jetta	CCTA	MQ350-6F
Jetta Sportwagen	CCTA	DQ250-6F
Jetta Sportwagen	ССТА	MQ350-6F
GTI	CCTA	DQ250-6F
GTI	CCTA	MQ350-6F

Section 5	Pg. 1	Test Group Description	Engine Code	R.CH-No.:	Revision Date
Test Group		9ADXV02.03UB	all		09-28-2009

### 5.1 Test Group Description

Test Group Name 9ADXV02.03UB
Summary Sheet Number 640T2-20
Engine displacements covered 2.0 liters
Arrangement and number of cylinders I-4 longitude

Vehicle class(es) covered LDV

Federal Emissions Standards Class Tier 2 BIN 5 California Emissions Standards Class LEV-II ULEV

### 5.2 Test Group Emission Standards

Please refer to CFEIS Summary sheet included in Section 7 for applicable emission standards.

### 5.3 Test Group Cold NMHC Emission Standards

In accordance with \$86.1811-10, all vehicles of this test group are part of the Cold NMHC phase in and are certified to fulfill the following family emission limits (FEL): Certification FEL = 0.3 g/mi

Interim in-use FEL = 0.4 g/mi (MY 2009, 2010, 2011, 2012)

**From:** "Hart, Robert (VWoA)" **Sent:** Wed 10/7/2009 7:02:14 PM

Subject: VW Group: Field Fixes in the Verify System

mailto:robert.hart@vw.com

Hello Jim,

A total of 13 field fixes for the following test groups have been uploaded to the Verify System over the last two days.

6ADXV02.0366 (2)

7ADXV02.0366 (2)

8ADXV02.0366 (1)

9ADXV02.0366 (1)

6ADXV02.0352 (1)

7ADXV02.0352 (1)

8ADXV02.0352 (1)

9ADXV02.0352 (1)

9ADXV02.03UA (1)

AADXV02.03UA (1)

6VWXV03.2535 (1)

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,

**Bob Hart** 

Robert Hart

**Emissions & Regulatory Analyst** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

From: "Hart, Robert (VWoA)"

Sent: Mon 10/19/2009 3:41:50 PM

Subject: VW Group: Test Waiver Requests Submitted

mailto:robert.hart@vw.com

Hello Jim,

This is just a "heads up" that I submitted two test waiver request for MY 2011 Audi carryover Test Group BADXV05.2LR8. Both vehicles were tested due to a higher ETW for the R8 Spyder. The automated manual transmission version is a new "worst case" for this test group.

Best regards,

Bob Hart

Robert Hart

**Emissions & Regulatory Analyst** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

Cc: "Rodgers, William" [William.Rodgers@vw.com]; Reineke, Dennis"

[Dennis.Reineke@vw.com]

From: "Hart, Robert (VWoA)"

Sent: Tue 10/27/2009 3:24:57 PM

**Subject:** AVWXV02.03PA mailto:robert.hart@vw.com

Hello Jim,

Here's the names and phone numbers we spoke about again just in case.

Dennis Reineke - 248-754-4215 Bill Rodgers - 248-754-4219

Best regards,

Bob Hart

Robert Hart

**Emissions & Regulatory Analyst** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

From: Ex. 7
Sent: Mon 11/9/2009 7:34:48 PM

Subject: VW Group: MY 2010 Volkswagen Running Change/Field Fix

CBI AVWXV03.6U46 APP C01 R00.PDF

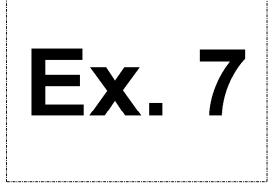
Ex. 7

Hello Jim,

While I was on vacation, a mixture of twenty VW and Audi field fixes were submitted to Verify. Field fix 01 for test group AVWXV03.6U46 was addressed to Dave Good instead of you. I have attached a copy for your convenience.

If you need a list of all twenty of the submitted field fix documents, let me know.

Best regards,



Volkswagen Group of America, Inc.



# **VOLKSWAGEN**

GROUP OF AMERICA

Mr. David Good Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105

Ex. 7

Name Title Department Phone Fax E-Mail

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD AUBURN HILLS, MI 48326

PHONE +1 248 754 5000

November 2, 2009 Date

Subject: Running Change/Field Fix for MY 2010 Volkswagen Test Group AVWXV03.6U46.

Dear Mr. Good,

With this letter we wish to inform the agency of a running change/field fix for the following test group:

Test Group : Evaporative Family :

AVWXV03.6U46 AVWXR0125246

Models:

Volkswagen CC, CC 4motion, Passat 4motion,

Passat Wagon 4motion

Transmission:

S6 automatic

The enclosed page describes running change/field fix RF\_AV3.6U46\_01\_09 which is for updated transmission software to improve drivability.

If you have any questions with regard to this information please contact our office in Auburn Hills at ( Ex. 7 Sincerely,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

Enclosure(s)

Subject:

Running Change / Field Fix

R/Ch / FFix.-No.:

RF\_AV3.6U46\_01\_09

**Test Group** 

AVWXV03.6U46 (MY 2010)

Description:

Updated ECM with new software calbration

to improve driveability while downshifting manually during

high engine loads.

	ECM		
	Part.No.	Calibration No.	
Passat CC			
Passat	03H 906 032 FP	5149	A44E9AA5
Passat wagon			
Passat CC 4motion Passat 4motion Passat wagon 4motion	03H 906 032 FQ	5150	0EAE9C44

Vehicles affected:

Vehicle

CC, CC 4motion, Passat 4motion, Passat Wagon 4motion

Drive:

FWD / AWD 3.6l/250 hp

Engine: Transmission: S6

Reason:

Engine behavior too rough while downshifting manually during high

engine loads in gear 1, 2 and 3

Request applies to:

Hardware Modification; Physical Spec.:

NO

Calibration:

new software calibration to address

better drivability

YES

**Application Correction** 

NO

Implementation date:

November 2009 rolling;

New ecm software calibration will be installed in production

and made available for service

Vehicles used for testing:

n.a.

**Engine Code:** 

**BLV** 

Impact on emissions:

This software change has no impact on emissions

### List of **ECM** currently certified

Carline	Trans mission	Engine Code	Part. No.	Cal. ID software calibration ID	CVN calibration verification no	Remarks
Passat CC	L 6 FWD	BLV	03H 906 032 FP	4735 5149	96639F99 A44E9AA5	SOP FF AV3.6U46 01 09
Passat CC			0011000000000			
Passat Passat wagon	L 6 AWD	BLV	03H 906 032 FQ	4736 5150	69197E5D 0EAE9C44	SOP FF_AV3.6U46_01_09

# Running Change / Field Fix Log

Model Year: 2010

Test Group: AVWXV03.6U46

Models: Volkswagen CC, CC 4motion, Passat 4motion, Passat

Wagon 4motion

Evaporative Family: AVWXR0125246

RC / FF Number	Description of Change / Reason	Date
RF_AV3.6U46_01_09	Update TCM to improve drivability during manual downshifts	Nov 02, 2009

Prefix:
RC = Running Change
RF = Running Change / Field Fix

FF = Field Fix

Jim Snyder/AA/USEPA/US@EPA[] To:

From: Mon 11/9/2009 8:42:03 PM Sent:

Subject: VW Group: More Field Fixes Addressed to Dave Good

CBI 9VWXV03.2535 APP F02 R00.PDF CBI AVWXV02.03SA APP F01 R00.PDF CBI AVWXV02.03UA APP F01 R00.pdf

Ex. 7

Hello Jim,

I found three more field fixes addressed to Dave Good. I attached copies for your convenience.

Best regards,



Volkswagen Group of America, Inc.



# **VOLKSWAGEN**

GROUP OF AMERICA

Mr. David Good Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105

Name Title Department Phone Fax E-Mail

October 30, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMUN ROAD

AUBURN HILLS, MI 48326 PHONE +1 248 754 5000

Subject: Field Fix for MY 2009 Volkswagen Test Group 9VWXV03.2535.

Dear Mr. Good,

With this letter we wish to inform the agency of a field fix for the following test group:

**Test Group** 9VWXV03.2535 **Evaporative Family** 9VWXR0110238

Models Volkswagen Eos, Audi A3 quattro, TT Coupe quattro, TT Roadster quattro S6 (DSG Direct Shift Gearbox) Transmission

The enclosed page describes field fix FF\_9V3.2535\_02\_08 which is for updated transmission software to correct erroneous high oil temperature faults.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Enclosure(s)

EPA FOIA Production 2016-09-01

2015-011272\_003053

# Field Fix MY 2009

Subject:

**Test Group:** 

9VWXV03.2535

Models:

Volkswagen EOS,

Audi A3 quattro, TT quattro, TT coupe quattro

Transmission:

DQ250-6F, DQ250-6A

**Event:** 

Gearbox clutch temperature sensor has the potential to falsely detect a high

oil temperature.

**Analysis:** 

Wiring harness of the temperature sensor may have connector wires that

were insufficiently crimped during a limited production period.

**Activities:** 

Gearbox reprogramming with updated software. The affected temperature

sensor will be deactivated and replaced by an modelled temperature.

Vehicle Type	Calibration Identi	fication	Calibration Verification	Release Date
Volkswagen EOS	02E 300 051 Q	1949	8a67	Oct 09
Audi A3 quattro	02E 300 011 DB	1952	0d6a	
Audi TT quattro	02E 300 011 DB	1951	bcc9	
Audi TT coupe quattro	02E 300 011 DB	1951	bcc9	

Impact on

**Emissions:** 

This change does not cause an impact on emissions.

Volkswagen, EASZ 10-29-2009

### Running Change / Field Fix Log

Model Year:

2009

Test Group:

9VWXV03.2535

Evaporative Family: 9VWXR0110238

Models:

Audi TT Coupe quattro, TT Roadster quattro

RC / FF Number	Description of Change / Reason	Date
RC_9VW3.2535_01_08	Increased curb weight / ETW for TT Coupe quattro.	SOP
FF_9V3.2535_02_09	transmission software to correct erroneous high oil temperature faults	Oct 2009

### Prefix:

RC = Running Change FF = Field Fix RF = Running Change / Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. David Good Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105



October 30, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326 PHONE +1 248 754 5000

Subject: Field Fix for MY 2010 Volkswagen Test Group AVWXV02.03SA.

Dear Mr. Good,

With this letter we wish to inform the agency of a field fix for the following test group:

Test Group AVWXV02.03SA
Evaporative Family AVWXR0110238
Models Volkswagen Eos

Transmission S6 (DSG Direct Shift Gearbox)

The enclosed page describes field fix FF\_AV2.03SA\_01\_09 which is for updated transmission software to correct erroneous high oil temperature faults.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Ex. 7

Enclosure(s)

# Field Fix MY 2010

Subject: Test Group: AVWXV02.03SA

Models: Volkswagen EOS

Transmission: DQ250-6F

**Event:** Gearbox clutch temperature sensor has the potential to falsely detect a high

oil temperature.

Analysis: Wiring harness of the temperature sensor may have connector wires that

were insufficiently crimped during a limited production period.

Activities: Gearbox reprogramming with updated software. The affected temperature

sensor will be deactivated and replaced by a modelled temperature.

Vehicle Type	Calibration Ident	ification	Calibration Verification	Release Date
Volkswagen EOS	02E 300 051 P	1940	ffbb	Oct 09

Impact on

Emissions: This change does not cause an impact on emissions.

Volkswagen, EASZ 10-29-2009

# Running Change / Field Fix Log

Model Year:

2010

Test Group:

AVWXV02.03UA

Models:

Volkswagen Eos, CC, Passat, Passat Wagon

Evaporative Family: AVWXR0110238

RC / FF Number	Description of Change / Reason	Date
FF_AV2.03UA_01_09	DSG transmission software update for erroneous high oil temp faults.	Oct 30, 2009

Prefix:
RC = Running Change
RF = Running Change / Field Fix
FF = Field Fix

# **VOLKSWAGEN**

GROUP OF AMERICA

Mr. David Good Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105



October 30, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326 PHONE +1 248 754 5000

Subject: Field Fix for MY 2010 Volkswagen Test Group AVWXV02.03UA.

Dear Mr. Good.

With this letter we wish to inform the agency of a field fix for the following test group:

Test Group Evaporative Family

Models

Transmission

AVWXV02.03UA

AVWXR0110238 Volkswagen Eos

S6 (DSG Direct Shift Gearbox)

The enclosed page describes field fix FF\_AV2.03UA\_01\_09 which is for updated transmission software to correct erroneous high oil temperature faults.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Ex. 7

Enclosure(s)

# Field Fix MY 2010

Subject:

**Test Group:** 

AVWXV02.03UA

Models:

Volkswagen EOS

**Transmission:** 

DQ250-6F

**Event:** 

Gearbox clutch temperature sensor has the potential to falsely detect a high

oil temperature.

**Analysis:** 

Wiring harness of the temperature sensor may have connector wires that

were insufficiently crimped during a limited production period.

**Activities:** 

Gearbox reprogramming with updated software. The affected temperature

sensor will be deactivated and replaced by a modelled temperature.

Vehicle Type	Calibration Ident	ification	Calibration Verification	Release Date
Volkswagen EOS	02E 300 051 P	1940	ffbb	Oct 09

Impact on

**Emissions:** 

This change does not cause an impact on emissions.

Volkswagen, EASZ 10-29-2009

### Running Change / Field Fix Log

Model Year: 2010

Test Group: AVWXV02.03UA

Models: Volkswagen Eos, CC, Passat, Passat Wagon

Evaporative Family: AVWXR0110238

RC / FF Number	Description of Change / Reason	Date
FF_AV2.03UA_01_09	DSG transmission software update for erroneous high oil temp faults.	Oct 30, 2009
- The state of the		

Prefix:
RC = Running Change
RF = Running Change / Field Fix
FF = Field Fix

From: "Hart, Robert (VWoA)"

Sent: Tue 11/10/2009 8:52:31 PM

Subject: RE: VW certification information request

Hello Jim,

I am sadly mistaken. I don't have Veteran's Day off. I was looking at the wrong calendar.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, November 10, 2009 3:39 PM

To: Hart, Robert (VWoA)

Subject: Fw: VW certification information request

Bob, a chemical engineer in the Advanced Technology Division is reviewing the 2010 TDI diesel in the Jetta, test group AVWXV02.0U5N. He asked me for the details on the aftertreatment and I couldn't find some of it in the certificate application documentation as required. Specifically information on the type of catalysts, catalyst loadings/volumes, DPF volume, and LNT loadings. Please supply the requested info, thanks.

Here is his note:

Jim hi, ... I was wondering if you could look up the 2010 Jetta and give me the particulars on the aftertreatment, type of converters/DPFs/LNT, catalyst loadings, volumes, etc, ... Lynn Sohacki told me you were the VW contact, thanks, Greg

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Hart, Robert (VWoA)"

Sent: Fri 11/13/2009 3:09:39 PM

Subject: VW Group: Requested Information for MY 2010 2.0I Diesel Aftertreatment

Volkswagen-MY2010 Golf-Jetta diesel OC-PTOX-NSC characteristics.doc

mailto:robert.hart@vw.com

Hello Jim,

Please let me know if the attached information is sufficient.

Best regards,

Bob Hart

Robert Hart

**Emissions & Regulatory Analyst** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

From: "Hart, Robert (VWoA)"

Sent: Mon 11/16/2009 3:35:02 PM

Subject: Confirmatory Test Schedule for EDV: 462 00184/10

mailto:robert.hart@vw.com

Hello Jim,

Germany is having problems with shipping and need to delay the confirmatory test for EDV: 462 00184/10 by a week. The current schedule for the test is 12/2/2009.

Please reschedule the test for this vehicle for the second week of December if possible.

Best regards,

Bob Hart

Robert Hart

**Emissions & Regulatory Analyst** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

From: Ex. 7

**Sent:** Thur 12/24/2009 12:53:31 AM

**Subject:** VW Group: MY 2000 Audi Field Fixes

CBI YADXV01.8332 APP F02 R00.PDF CBI YADXV01.8336 APP F03 R00.PDF

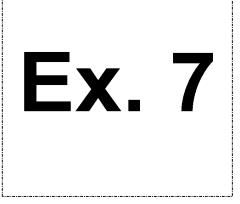
Hello Jim,

Attached you will find two MY 2000 Audi ignition coil related field fixes. MY 2000 is too old to upload to the VERIFY System.

Best regards,



Volkswagen Group of America, Inc.



# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105

Ex. 7 Photographic 
Name Title Department Phone Fax E-Mail

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326

PHONE +1 248 754 5000

December 22, 2009 Date

Subject: Field Fix for MY 2000 Audi Test Group YADXV01.8332

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group;

YADXV01.8332

Models

All

Transmission

All

The enclosed pages describe Field Fix FF\_YA1.8332\_02\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Ex. 7

Enclosure(s)

# Field Fix MY 2000

Subject:

**Field Fix Nr.:** FF\_YA1.8332\_02\_09

Model Year 2000

Test Group: YADXV01.8332

Models: all Transmission: all

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Model	Part number new	Release Date
all	06A 905 115 D	Nov-09

Impact on

**Emissions:** This change does not cause an impact on emissions.

AUDI AG 12-21-2009

### Running Change / Field Fix Log

Model Year: 2000

Test Group: YADXV01.8332 Evaporative Family: YADXR0140232 Models: Audi A4, A4 quattro

VW Passat, Passat Wagon

RC / FF Number	Description of Change / Reason	Date
FF_YA1.8332_01_09	New software calibration with and improved catalyst monitor calibration, an adjustment to diagnostic strategy air intake volume/time, an adjusted misfire monitor for part protection and an adjusted EVAP monitor below 40°F.	Feb. 24. 2009
FF_YA1.8332_02_09	Replacement Ignition Coil	December 2009

Prefixes:
RC = Running Change
RF = Running Change/Field Fix
FF = Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105



December 22, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326

PHONE +1 248 754 5000

Subject: Field Fix for MY 2000 Audi Test Group YADXV01.8336

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group;

YADXV01.8336

Models

All

Transmission

All

The enclosed pages describe Field Fix FF\_YA1.8336\_03\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7** 

Sincerely,

Ex. 7

Enclosure(s)

# Field Fix MY 2000-2002

Subject:

Field Fix Nr.: FF\_YA1.8336\_03\_09 FF\_1A1.8336\_02\_09

**Model Year** 2000 2001

**Test Group:** YADXV01.8336 1ADXV01.8336

Models:allallTransmission:allall

**Field Fix Nr.:** FF\_2A1.8336\_02\_09

Model Year 2002

Test Group: 2ADXV01.8336

Models: all Transmission: all

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Vehicle Type	/ehicle Type Part number new	
all	06A 905 115 D	Nov-09

Impact on

**Emissions:** This change does not cause an impact on emissions.

AUDI AG 12-21-2009

### Running Change / Field Fix Log

Model Year: 2000

Test Group: YADXV01.8336

Evaporative Family: VW: 1ADXR0110234

Audi: 1ADXR0130242

Models: VW Golf, Jetta, New Beetle

Audi TT, TT Roadster

RC / FF Number		
	Description of Change / Reason	Date
RC_YA1.8336_01_99	Addition of Audi TT Quattro	5/10/1999
RC-YA1.8336_02_99	Addition of several carlines and engine codes	10/12/1999
FF_YA1.8336_03_09	Replacement Ignition Coil	December 2009

Prefixes:

RC = Running Change

RF = Running Change/Field Fix

FF = Field Fix

To: Jim Snyder/AA/USEPA/US@EPA[]

From: Ex. 7

**Sent:** Thur 12/24/2009 12:53:43 AM

Subject: VW Group: MY 2001 Audi Field Fixes

CBI 1ADXV01.8336 APP F02 R00.PDF CBI 1ADXV01.8342 APP F03 R00.PDF CBI 1ADXV01.8346 APP F05 R00.PDF CBI 1ADXV01.8347 APP F01 R00.PDF

Hello Jim,

Attached you will find four MY 2001 Audi ignition coil related field fixes. MY 2001 is too old to upload to the VERIFY System.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105



December 22, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMUN ROAD

AUBURN HILLS, MI 48326

PHONE 41 248 754 5000

Subject: Field Fix for MY 2001 Audi Test Group 1ADXV01.8336

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group; 1ADXV01.8336

Models All

Transmission All

The enclosed pages describe Field Fix FF\_1A1.8336\_02\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7** 

Sincerely,

Ex. 7

## Field Fix MY 2000-2002

Subject:

Field Fix Nr.: FF\_YA1.8336\_03\_09 FF\_1A1.8336\_02\_09

**Model Year** 2000 2001

**Test Group:** YADXV01.8336 1ADXV01.8336

Models:allallTransmission:allall

**Field Fix Nr.:** FF\_2A1.8336\_02\_09

Model Year 2002

Test Group: 2ADXV01.8336

Models: all Transmission: all

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Vehicle Type	Part number new	Release Date
all	06A 905 115 D	Nov-09

Impact on

**Emissions:** This change does not cause an impact on emissions.

Model Year: 2001

Test Group: 1ADXV01.8336

Evaporative Family: VW: 1ADXR0110234

Audi: 1ADXR0130242

Models: VW Golf, Jetta, New Beetle

Audi TT, TT Roadster

RC / FF Number		
	Description of Change / Reason	Date
RC_1A1.8336_02_09	Addition of Golf/GTI/Jetta	9/20/2000
FF_1A1.8336_02_09	Replacement Ignition Coil	December 2009

Prefixes:

RC = Running Change RF = Running Change/Field Fix

GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105 Ex. 7

Name
Title
Department
Phone
Fax
E-Mail

December 21, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326

PHONE +1 248 754 5000

Subject: Field Fix for 2001 Audi Test Group 1ADXV01.8342

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group;

1ADXV01.8342

Models

ΑII

Transmission

All

The enclosed pages describe Field Fix FF\_1A1.8342\_03\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Ex. 7

## Field Fix MY 2001-2006

#### Subject:

Field Fix Nr.: FF\_1A1.8342\_03\_09 FF\_2A1.8342\_19\_09

**Model Year** 2001 2002

**Test Group:** 1ADXV01.8342 2ADXV01.8342

Models:allallTransmission:allall

Field Fix Nr.: FF\_3A1.8342\_11\_09 FF\_4A1.8342\_08\_09

2004

Model Year 2003

**Test Group:** 3ADXV01.8342 4ADXV01.8342

Models:allallTransmission:allall

Field Fix Nr.: FF\_5A1.8342\_05\_09 FF\_6A1.8342\_02\_09

**Model Year** 2005 2006

**Test Group:** 5ADXV01.8342 6ADXV01.8342

Models:allallTransmission:allall

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Model	Part number new	Release Date
all	06A 905 115 D	Nov-09

Impact on

**Emissions:** This change does not cause an impact on emissions.

Model Year: 2001

Test Group: 1ADXV01.8342 Evaporative Family: 1ADXR0140232

Models: Audi A4, A4 quattro

VW Passat

RC / FF Number	Description of Change / Reason	Date
	New software calibration for increase to 170 H.P. and increased ETW to 3625 lbs. for	
RC_1A1.8342_01_00	new Passat facelift model.	Oct. 4, 2000
		,
	New software calibration with and improved catalyst monitor calibration, an adjustment to diagnostic strategy air intake volume/time, an adjusted misfire monitor for part	
FF_1A1.8342_02_09	protection and an adjusted EVAP monitor below 40°F.	Feb. 24. 2009
77_17(1.0012_02_00	processor and an adjusted EVAL montes polon to 1.	7 GD. Z 1. ZGGG
EE 444 8242 02 00	Parlacement Invition Calls	Danamban 2000
FF_1A1.8342_03_09	Replacement Ignition Coils	December 2009

Prefix:
RC = Running Change
RF = Running Change / Field Fix

GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105 Ex. 7
Name
Title
Department
Phone
Fax
E-Mail

December 22, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326

PHONE +1 248 754 5000

Subject: Field Fix for MY 2001 Audi Test Group 1ADXV01.8346

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group; 1ADXV01.8346

Models All

Transmission All

The enclosed pages describe Field Fix FF\_1A1.8346\_05\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at \_\_\_\_\_\_ Ex. 7

Sincerely,

Ex. 7

## Field Fix MY 2001-2006

#### Subject:

Field Fix Nr.: FF\_1A1.8346\_05\_09 FF\_2A1.8346\_09\_09

**Model Year** 2001 2002

**Test Group:** 1ADXV01.8346 2ADXV01.8346

Models:allallTransmission:allall

Field Fix Nr.: FF\_3A1.8346\_09\_09 FF\_4A1.8346\_04\_09

2004

Model Year 2003

**Test Group:** 3ADXV01.8346 4ADXV01.8346

Models:allallTransmission:allall

Field Fix Nr.: FF\_5A1.8346\_01\_09 FF\_6A1.8346\_01\_09

**Model Year** 2005 2006

**Test Group:** 5ADXV01.8346 6ADXV01.8346

Models:allallTransmission:allall

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Model	Part number new	Release Date
all	06A 905 115 D	Nov-09

Impact on

**Emissions:** This change does not cause an impact on emissions.

Model Year: 2001

Test Group: 1ADXV01.8346

Evaporative Family: VW: 1ADXR0110234

Audi: 1ADXR0130242

Models: VW Golf, Jetta, New Beetle

Audi TT, TT Roadster

RC / FF Number	Description of Change / Reason	Date
01	Addition of Audi TT and TT Roadster models, Addition of Evaporative Family 1ADXR0130242	August 15, 2000
FF01	Optimization of software calibration to prevent misfire during cold start Volkswagen Models	June 26, 2002
F04ECM_1-3mAD	ECM software change - misfire prevention	April 7, 2003
FF_1A1.8346_04_07 FF_1A1.8346_05_09	New ECM calibration. Adjusted Catalyst Monitor avoiding false MIL illumination. Adjusted Misfire Monitor to improve part protection. Replacement Ignition Coil	August 2007 rolling December 2009

Prefixes:

RC = Running Change

RF = Running Change/Field Fix

GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105 Ex. 7
Name
Title
Department
Phone
Fax
E-Mail

December 22, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, ML48326

PHONE +1 248 754 5000

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group; 1ADXV01.8347

Subject: Field Fix for MY 2001 Audi Test Group 1ADXV01.8347

Models All

Transmission All

The enclosed pages describe Field Fix FF\_1A1.8347\_01\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Ex. 7

## Field Fix MY 2001-2002

Subject:

Field Fix Nr.: FF\_1A1.8347\_01\_09 FF\_2A1.8347\_01\_09

**Model Year** 2001 2002

**Test Group:** 1ADXV01.8347 2ADXV01.8347

Models:allallTransmission:allall

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Vehicle Type	Part number new	Release Date
all	06A 905 115 D	Nov-09

Impact on

**Emissions:** This change does not cause an impact on emissions.

Model Year: 2001

1ADXV01.8347 Test Group:

Evaporative Family: Audi: 1ADXR0130242

Models:

Audi TT Quattro

RC / FF Number		
	Description of Change / Reason	Date
FF_1A1.8347_01_09	Replacement Ignition Coil	December 2009

Prefixes:

RC = Running Change RF = Running Change/Field Fix

To: Jim Snyder/AA/USEPA/US@EPA[]

From: Ex. 7

**Sent:** Thur 12/24/2009 12:53:51 AM

**Subject:** VW Group: MY 2002 Audi Field Fixes

CBI 2ADXV01.8336 APP F02 R00.PDF CBI 2ADXV01.8342 APP F19 R00.PDF CBI 2ADXV01.8346 APP F09 R00.PDF CBI 2ADXV01.8347 APP F01 R00.PDF CBI 2ADXV03.0344 APP F03 R00.PDF

Hello Jim,

Attached you will find five MY 2002 Audi ignition coil related field fixes. MY 2002 is too old to upload to the VERIFY System.

Best regards,

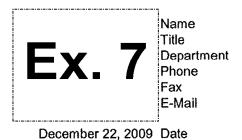
Ex. 7

Volkswagen Group of America, Inc.

**Ex.** 7

#### GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105



Subject: Field Fix for MY 2002 Audi Test Group 2ADXV01.8336

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group;

2ADXV01.8336

Models

All

Transmission

All

The enclosed pages describe Field Fix FF\_2A1.8336\_02\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Ex. 7

Enclosure(s)

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMUN ROAD

AUBURN HILLS, MI 48326

PHONE +1 248 754 5000

## Field Fix MY 2000-2002

Subject:

Field Fix Nr.: FF\_YA1.8336\_03\_09 FF\_1A1.8336\_02\_09

**Model Year** 2000 2001

**Test Group:** YADXV01.8336 1ADXV01.8336

Models:allallTransmission:allall

**Field Fix Nr.:** FF\_2A1.8336\_02\_09

Model Year 2002

Test Group: 2ADXV01.8336

Models: all Transmission: all

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Vehicle Type	Part number new	Release Date
all	06A 905 115 D	Nov-09

Impact on

**Emissions:** This change does not cause an impact on emissions.

Model Year: 2002

Test Group: 2ADXV01.8336

Evaporative Family: VW: 2ADXR0110234

Audi: 2ADXR0130242

Models: VW Golf, Jetta, New Beetle

Audi TT, TT Roadster

RC / FF Number		
	Description of Change / Reason	Date
RC_2A1.8336_01_02	The addition of ALMS model with 18 inch wheels and 225/40R18 tires. Increase of Equivalent Test Weight(ETW) of TT Roadster. The addition of 3.31 final drive	4/20/2002
FF_2A1.8336_02_09	Replacement Ignition Coil	December 2009

Prefixes:

RC = Running Change RF = Running Change/Field Fix

#### GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105



December 21, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326

PHONE +1 248 754 5000

Subject: Field Fix for 2002 Audi Test Group 2ADXV01.8342

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group; 2ADXV01.8342

Models All

Transmission All

The enclosed pages describe Field Fix FF\_2A1.8342\_19\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Ex. 7

## Field Fix MY 2001-2006

#### Subject:

Field Fix Nr.: FF\_1A1.8342\_03\_09 FF\_2A1.8342\_19\_09

**Model Year** 2001 2002

**Test Group:** 1ADXV01.8342 2ADXV01.8342

Models:allallTransmission:allall

Field Fix Nr.: FF\_3A1.8342\_11\_09 FF\_4A1.8342\_08\_09

2004

Model Year 2003

**Test Group:** 3ADXV01.8342 4ADXV01.8342

Models:allallTransmission:allall

Field Fix Nr.: FF\_5A1.8342\_05\_09 FF\_6A1.8342\_02\_09

**Model Year** 2005 2006

**Test Group:** 5ADXV01.8342 6ADXV01.8342

Models:allallTransmission:allall

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Model	Part number new	Release Date
all	06A 905 115 D	Nov-09

Impact on

Emissions: This change does not cause an impact on emissions.

Model Year: 2002

Test Group: 2ADXV01.8342 Evaporative Family: 2ADXR0140262 2ADXR0140232

Models: Audi A4, A4 Cabriolet, A4 quattro, A4 Avant, A4 Avant quattro

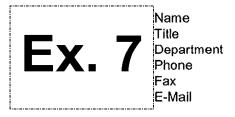
VW Passat / Passat Wagon

RC / FF Number	Description of Change / Reason	Date
RC_2A1.8342_02_01	Addition of the new 6 <sup>th</sup> generation A4	04/17/01
RC_2A1.8342_03_01	Addition of A4, A4 quattro models	06/12/01
RC_2A1.8342_04_01	Testing of the automatic in Sport and Tiptronic modes.	10/22/01
RC_2A1.8342_05_01	Addition of A4 Avant quattro model	12/21/01
RF_2A1.8342_06_02	Misfire during 1 <sup>st</sup> 1000 revolutions after cold start related to fuel quality	06/11/02
RF_2A1.8342_07_02	Calibration revision to prevent misfire after cold starts	06/11/02
FF_2A1.8342_08_03	New TCM software level to improve shift quality	02/04/03
FF_2A1.8342_09_03	New ECM software level to unify P codes for knock sensor	02/05/03
FF_2A1.8342_10_03	New ECM software to unify ECM to cover both automatic and manual trans.	02/05/03
FF_2A1.8342_11_03	Rough idle and MIL on during 1 <sup>st</sup> 1000 revolutions after cold start related to fuel quality	02/07/03
FF_2A1.8342_12_03	Rough idle and MIL on during 1 <sup>st</sup> 1000 revolutions after cold start related to fuel quality	02/13/03
FF_2A1.8342_13_03	New ECM software level to modify characteristics for engine speed limiter	02/18/03
FF_2A1.8342_01_06	New ECM software level turns off EVAP check below 4'C	10/31/06
FF_2A1.8342_14_06	Introduction of new EVAP purge flow valve	11/07/06
FF_2A1.8342_15_07	New ECM software level to enhance system strategies for misfire detection, throttle contamination, catalyst diagnosis and EVAP system test as low ambient temps.	02/15/07
FF_2A1.8342_16_07	New ECM software to correct premature MIL on for catalyst efficiency fault.	03/13/07
FF_2A1.8342_17_07	New ECM software level to improve cold start behavior and the EVAP Purge Valve	03/14/07
FF_2A1.8342_18_09	New software calibration with and improved catalyst monitor calibration, an adjustment to diagnostic strategy air intake volume/time, an adjusted misfire monitor for part protection and an adjusted EVAP monitor below 40°F.	Feb. 24, 2009
FF_2A1.8342_19_09	Replacement Ignition Coil	December 2009

Prefix:
RC = Running Change
RF = Running Change / Field Fix
FF = Field Fix

GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105



December 22, 2009 Date

VOLKSWAGEN GROUP OF AMERICA INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326

PHONE 41 248 754 5000

Subject: Field Fix for MY 2002 Audi Test Group 2ADXV01.8346

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group;

2ADXV01.8346

Models

All

Transmission

ΑII

The enclosed pages describe Field Fix FF\_2A1.8346\_09\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Ex. 7

## Field Fix MY 2001-2006

#### Subject:

Field Fix Nr.: FF\_1A1.8346\_05\_09 FF\_2A1.8346\_09\_09

**Model Year** 2001 2002

**Test Group:** 1ADXV01.8346 2ADXV01.8346

Models:allallTransmission:allall

Field Fix Nr.: FF\_3A1.8346\_09\_09 FF\_4A1.8346\_04\_09

2004

Model Year 2003

**Test Group:** 3ADXV01.8346 4ADXV01.8346

Models:allallTransmission:allall

Field Fix Nr.: FF\_5A1.8346\_01\_09 FF\_6A1.8346\_01\_09

**Model Year** 2005 2006

**Test Group:** 5ADXV01.8346 6ADXV01.8346

Models:allallTransmission:allall

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Model	Part number new	Release Date
all	06A 905 115 D	Nov-09

Impact on

Emissions: This change does not cause an impact on emissions.

Model Year: 2002

Test Group: 2ADXV01.8346

Evaporative Family: VW: 2ADXR0110234

Audi: 2ADXR0130242

Models: VW GTI, Golf, Jetta, Jetta Wagon, New Beetle

Audi TT, TT Roadster

RC / FF Number		
	Description of Change / Reason	Date
RC_2A1.8246_02_01	Horsepower increase and addition of new 5 speed automatic transmission to the Golf/Jetta	March 2001
RC_2A1.8346_03_01 (2346/01)	Horsepower increase and the addition of a 6 speed manual transmission to the New Beetle	December 21, 2001
RF_2A1.0346_04_02 (2346/03)	Revision of the fuel system calibration to prevent misfire after cold starts.	June 24, 2002
FF_2A1.8346_06_03 (F04ECM_1-3mAD)	New ECM calibration to prevent misfire in the first 1000 revolutions under certain conditions	April 7, 2003
FF_2A1.8346_07_06 (2-346/01/06)	EVAP leak monitor enabled above 5'C intake air temperature only.	May 2006 rolling
FF_2A1.8346_08_07 FF_2A1.8346_09_09	New software calibration to adjust the Catalyst Monitor to avoid false MIL illumination and adjust the Misfire Monitor to improve part protection based on newer model year experience.  Replacement Ignition Coil	August 2007 rolling December 2009

Prefixes:

RC = Running Change

RF = Running Change/Field Fix

GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105 Ex. 7

Name
Title
Department
Phone
Fax
E-Mail

December 22, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326

PHONE +1 248 754 5000

Subject: Field Fix for MY 2002 Audi Test Group 2ADXV01.8347

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group; 2ADXV01.8347

Models All

Transmission All

The enclosed pages describe Field Fix FF\_2A1.8347\_01\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Ex. 7

## Field Fix MY 2001-2002

Subject:

Field Fix Nr.: FF\_1A1.8347\_01\_09 FF\_2A1.8347\_01\_09

**Model Year** 2001 2002

**Test Group:** 1ADXV01.8347 2ADXV01.8347

Models:allallTransmission:allall

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Vehicle Type	Part number new	Release Date
all	06A 905 115 D	Nov-09

Impact on

**Emissions:** This change does not cause an impact on emissions.

Model Year: 2002

2ADXV01.8347 Test Group:

Evaporative Family: Audi: 2ADXR0130242

Models:

Audi TT Quattro

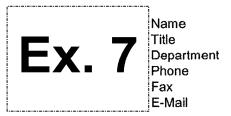
RC / FF Number		_
	Description of Change / Reason	Date
FF_2A1.8347_01_09	Replacement Ignition Coil	December 2009

Prefixes:

RC = Running Change RF = Running Change/Field Fix

#### GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovative Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Drive Ann Arbor, MI 48105



December 22, 2009 Date

VOLKSWAGEN GROUP OF AMERICA, INC.

3800 HAMLIN ROAD

AUBURN HILLS, MI 48326

PHONE +1 248 754 5000

Subject: Field Fix for MY 2002 Audi Test Group 2ADXV03.0344

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

Test Group;

2ADXV03.0344

Models

All

Transmission

All

The enclosed pages describe Field Fix FF\_2A3.0344\_03\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at Ex. 7

Sincerely,

Ex. 7

## Field Fix MY 2002-2004

#### Subject:

Field Fix Nr.: FF\_2A3.0344\_03\_09 FF\_3A3.0344\_02\_09

**Model Year** 2002 2003

**Test Group:** 2ADXV03.0344 3ADXV03.0344

Models:allallTransmission:allall

Field Fix Nr.: FF\_4A3.0344\_01\_09

Model Year 2004

Test Group: 4ADXV03.0344

Models: all Transmission: all

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

Analysis: DTCs for misfire in one or more cylinders are stored in the ECM.

The misfire condition can be caused by an inoperative ignition coil.

Activities: A new generation of ignition coils is being installed in production.

The improved ignition coil will be used in the workshop to satisfy customer.

Model	Partnumber new	Release Date
all	06C 905 115 M	Nov-09

Impact on

**Emissions:** This change does not cause an impact on emissions.

Model Year: 2002

Test Group: 2ADXV03.0344

Evaporative Family: Audi: 2ADXR0140232

2ADXR0140233 2ADXR0140262

Models: A4, A4 Quattro, A6, A6 Quattro

RC / FF Number		
	Description of Change / Reason	Date
RC_2A3.0344_01_01	Addition of Audi A4 Avant quattro model  The revision of the OBD system calibration to reduce false Malfunction Indicator Light (MIL) illumination. The diagnosis threshold has been changed in the Engine control Modules	11/01/2001
FF_2A3.0344_02_02	(ECM).	5/31/2002
FF_2A3.0344_03_09	Replacement Ignition Coil	December 2009

Prefixes:

RC = Running Change

RF = Running Change/Field Fix

To: Jim Snyder/AA/USEPA/US@EPA[]

From: Ex. 7

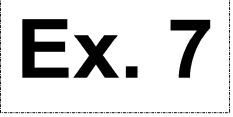
**Sent:** Tue 1/26/2010 8:15:32 PM **Subject:** VW Meeting - January 27, 2010

Microsoft PowerPoint - EPA agenda presentation Jan 2010 part1.pdf

Hello Jim:

I have attached a copy of slides for our meeting tomorrow. The slides through 9 cover the first agenda point, Audi Q5 Hybrid, and slides 10 and 11 are placeholders for the second and third agenda items. We will send additional slides in the morning.

Best regards,



Volkswagen Group of America, Inc.



To: Jim Snyder/AA/USEPA/US@EPA[]

From: Ex. 7

**Sent:** Wed 1/27/2010 3:40:05 PM

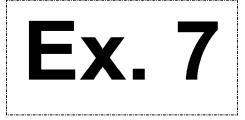
Subject: RE: VW Meeting - January 27, 2010

Microsoft PowerPoint - EPA agenda presentation Jan 2010 part2.pdf

Hello Jim:

As mentioned yesterday, I am now providing the Part 2 of the presentation for our meeting today.

Best regards,



Volkswagen Group of America, Inc.

Ex. 7

From: Ex. 7

Sent: Tuesday, January 26, 2010 3:16 PM

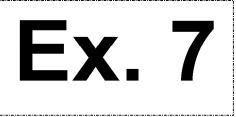
To: 'Jim Snyder/AA/USEPA/US'

Subject: VW Meeting - January 27, 2010

Hello Jim:

I have attached a copy of slides for our meeting tomorrow. The slides through 9 cover the first agenda point, Audi Q5 Hybrid, and slides 10 and 11 are placeholders for the second and third agenda items. We will send additional slides in the morning.

Best regards,



Volkswagen Group of America, Inc.

Ex. 7

# Ex. 7

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Thomas, Suanne"

**Sent:** Mon 2/1/2010 7:11:09 PM

Subject: VW: AECD Submission V6 diesel 3.0L Test Group

ARB 01Feb2010 AECD EPA.pdf

CBI BADXT03.03UG RFA AECD .PDF

suanne.thomas@vw.com

Dear Jim:

Attached is the information we just discussed regarding the AECD information for our V6 diesel.

We have used a new format for the information with the intent to make it more clear how the strategies work to assist in your review.

Please let me know if you would like an overview of the information via conference call. We are happy to do that, just let me know what time would be convenient for you.

Note: a timeslot in the morning would be preferable for us.

Sincerely,

**Suanne Thomas** 

Engineering and Environmental Office

Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Phone: (248) 754-4206

Cell: (248) 797-4074 FAX: (248) 754-4207

E-Mail: suanne.thomas@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

**Cc:** "Kissling, Karlheinz (N/EA-521)" [Karlheinz.Kissling@AUDI.DE]; Kata, Leonard"

[Leonard.Kata@vw.com]

From: "Reineke, Dennis"

Sent: Wed 2/3/2010 9:19:28 PM Subject: Audi Durability Grouping

Hello Jim,

In response to our recent phone discussion about Durability Grouping the information below describes Audi's request to group vehicles in a durability group that would normally not be eligible to be in a single durability group.

Audi intends to use one catalyst to meet both U.S. and new European (EU5) emission requirements in select models. Currently we are making two requests. The first is for the 2011 MY Audi S5. The second is for the Audi R8 4.2. Listed below are the details of the catalysts Audi would like to group together in the same durability and test groups.

#### 1) The Audi S5 with 4.2 liter V8 engine.

The Audi S5 will use a catalyst with a higher precious metal loading rate. This change will occur as part of the carryover of the 50-State certified Audi S5 models. All vehicles in the durability group/test group will be built with the new catalyst. Engine calibration, catalyst size, catalyst location and catalyst precious metal composition are all unchanged. The only difference compared to previous model years is the increased precious metal loading rate.

Development testing shows a reduction of approximately 10% in emissions and no effect on fuel economy. Based on supplier testing and Audi AG's experience with similar catalyst the deterioration rate for this new catalyst is expect to be equal to or better than the existing catalyst. Audi intends to include this vehicle/catalyst in carryover durability group BADXGPGNN365 / Test Group BADXV04.2365. Durability factors from the 2008-10 MY carryover durability vehicle would be used to support 2011 MY certification. (A new durability vehicle would not be required.)

Durability Group: BADXGPGNN365 Test Group: BADXV04.2365

Audi S5 4.2
MY 08/09/10 MY11
Emission Standard LEV II
Type of Coating REX 1662 REX 2073
Precious metal load rate 80 g/ft3 120 g/ft3
PM (Pt: Pd: Rh) 0: 11: 1
Supplier BASF

#### 2) The Audi R8 4.2

The Audi R8 4.2 will use catalysts with a revised Precious Metal (PM) composition for both the precatalyst and main catalyst as well as an increase in the Cells/Inch2. The loading rate is unchanged however the surface area in the precat is increased due to the 33% increase in the number of Cells/Inch2. The change will occur as part of the carryover of the 50-State certified Audi R8 4.2 models. All vehicles in

the durability group/test group will be built with the new catalyst. PM loading rate, catalyst size and catalyst locations are all unchanged. The only differences compared to previous model years are the increased cell count and the PM composition..

Development testing shows a reduction of approximately 10% in emissions and no effect on fuel economy. Based on supplier testing and Audi AG's experience with similar catalyst the deterioration rate for this new catalyst is expect to be equal to or better than the existing catalyst. Audi intends to include this vehicle/catalyst in carryover durability group BADXGPGNN375 / Test Group BADXV04.2375. Durability factors from the 2008-10 MY carryover durability vehicle would be used to support 2011 MY certification. (A new durability vehicle would not be required.)

Durability Group: BADXGPGNN375 Test Group: BADXV04.2375

Audi R8 4.2
MY 08/09/10 MY11

Pre Emission Standard LEV II

Catalyst Type of Coating LEX 1365 M30 REX 2073
Precious metal load rate 150 g/ft3 150 g/ft3
PM (Pt: Pd: Rh) 1: 19: 1 0: 20: 1
Cell Density – cells/inch2 400 600
Foil Thickness 0.050 mm. 0.030 mm.
Supplier BASF

Main Emission Standard LEV II
Catalyst Type of Coating LEX 120 REX 2073
Precious metal load rate 100 g/ft3 100 g/ft3
PM (Pt: Pd: Rh) 1: 19: 1 0: 20: 1
Cell Density – cells/inch2 300 300
Cell Wall Thickness 0.050 mm. 0.050 mm.
Supplier BASF

We believe this approach is allowed under 86.1820-01(e)

Please review and contact me with any questions.

Thank you,

Dennis E. Reineke Certification Specialist Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 USA

Phone: +1-248-754-4215 Fax: +1-248-754-4207

Mail To: Dennis.Reineke@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Thomas, Suanne"

**Sent:** Tue 2/16/2010 6:05:21 PM

Subject: RE: VW: AECD Submission V6 diesel 3.0L Test Group

suanne.thomas@vw.com

Hi Jim: just checking if you have any comments/feedback for us.

Take care, Suanne

From: Thomas, Suanne

Sent: Monday, February 01, 2010 2:11 PM

To: 'snyder.jim@epa.gov'

Subject: VW: AECD Submission V6 diesel 3.0L Test Group

Dear Jim:

Attached is the information we just discussed regarding the AECD information for our V6 diesel.

We have used a new format for the information with the intent to make it more clear how the strategies work to assist in your review.

Please let me know if you would like an overview of the information via conference call. We are happy to do that, just let me know what time would be convenient for you.

Note: a timeslot in the morning would be preferable for us.

Sincerely,

**Suanne Thomas** 

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Phone: (248) 754-4206 Cell: (248) 797-4074 FAX: (248) 754-4207

E-Mail: suanne.thomas@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

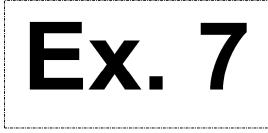
From: Ex. 7

Sent: Tue 3/2/2010 5:04:38 PM Subject: RE: VW/Audi Meeting

Hi Jim:

Thanks for scheduling the meeting. I am working with my colleagues in Germany to get more details. I hope to have additional information this week.

Best regards,



Volkswagen Group of America, Inc.



From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, February 22, 2010 3:45 PM

To: **Ex. 7** 

Subject: Re: VW/Audi Meeting

Hi[Ex. 7] I scheduled a meeting so we have a room reserved. Can you give me some specifics? Is it more certification type questions, confirmatory data or testing issues?

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: Ex. 7

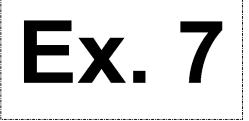
To: Jim Snyder/AA/USEPA/US@EPA

Date: 02/17/2010 06:24 PM Subject: VW/Audi Meeting

## Hello Jim:

I guess that my colleagues from Germany have some additional questions regarding certification of EVs, FCEVs, PHEV etc. They will be in the Detroit area in mid-March. Is it possible to schedule a meeting for the morning of March 18, 2010? This would be in addition to the meeting that we have schedule for March 4, 2010.

Best regards,



Volkswagen Group of America, Inc.



To: Jim Snyder/AA/USEPA/US@EPA[] Cc: [	
Ex. 7	
From: Ex. 7 Sent: Wed 3/10/2010 1:43:52 PM Subject: RE: VW/Audi Meeting Agenda EPA Cert.pdf	
Hello Jim:	
I have your invitation for the meeting that we requested on my calendar for March 18, 2010 at EPA Ann Arbor (09:30 $-$ 11:00). I have also received the attached draft agenda. If there are any related topics that you wish to discuss, please feel free to add to the agenda.	
At this point, I expect 4 or 5 people from the VW Group. I will bring a laptop and projector.	
Best regards,	
Ex. 7	
From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov] Sent: Monday, February 22, 2010 3:45 PM To: Ex. 7 Subject: Re: VW/Audi Meeting	
Hi Ex. 7   scheduled a meeting so we have a room reserved. Can you give me some specifics? Is it more certification type questions, confirmatory data or testing issues?	
Jim Snyder Light-Duty Vehicle Group	

1

(734) 214-4946 snyder.jim@epa.gov

Compliance and Innovative Strategies Division United States Environmental Protection Agency

From:	Ex. 7
То:	Jim Snyder/AA/USEPA/US@EPA
Date:	

02/17/2010 06:24 PM

Subject:

VW/Audi Meeting

To: Robert Peavyhouse/AA/USEPA/US@EPA[] Cc: Jim Snyder/AA/USEPA/US@EPA;"Thomas, Suanne" [Suanne.Thomas@vw.com]; Thomas, Suanne" [Suanne.Thomas@vw.com] From: "Hart, Robert (VWoA)" Sent: Wed 3/10/2010 6:10:46 PM
<b>Subject:</b> Request for Federal OBD Approval for MY 2011 Volkswagen Test Group BVWXV02.5U35
CBI BVWXV02.5U35 RFA OBD R00.PDF
Hello Robert,
Laws and in this a wall as a "banda we" far a request for Fadaral ODD approval for madel was 2011
I am sending this e-mail as a "heads-up" for a request for Federal OBD approval for model year 2011 Volkswagen test group BVWXV02.5U35 that I just submitted through the Verify System. I have attached a copy of the submitted file for your convenience. Approval is requested by CW 16/10 (week of Monday, Apr. 19, 2010).
If you have any questions regarding this request, please contact me as indicated below.
Best regards,
Bob Hart
Robert Hart
Nobel Chart
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

## **OBD Description Submission**

As indicated by meeting between EPA / Volkswagen and a letter to EPA Volkswagen is requesting MY11 OBD approval for the following OBD group / test group:

OBD Group	BVW-I5
Test group(s)	BVWXV02.5U35 (Jetta, Jetta Sportwagen, Golf)
Engine Code(s)	СВТА
MY	2011
Standard	Tier2 Bin 5 (Federal only)
Transmission Group	BVW-AIS (Aisin) carry over from MY10
Application submission	New for MY11
Summary table	Based on MY 08 ARB approved OBD system (please see submitted file)
Emission Control System	SFI/TWC/HO2S(2)
ARB OBD Approval	Approval letter MY 2008 is attached for reference
Test Group in MY 2008	8VWXV02.5253
Federal OBD	OBD System for this test group complies with
	CFR §86.1806-01, §86.06-04 and §86.06-05 for light duty vehicle with gasoline engine
Concept Differences in	OBD threshold application based on Tier 2 Bin5
comparison to MY 2008 ARB system approval	NMHC correlated catalyst monitor
System approval	EVAP leak detection based on 1.0mm orifice
	No IUMPR support
	No Secondary Air System
Deficiency MY08	None
Concern MY08	RO2 sensor, purge valve monitoring, fuel system monitoring, VVT monitoring (E05-188 and E06-019)
	MAP Sensor Monitor (E-06-078)
	Concerns are addressed during certification preview meeting and separate submittals.
OBD Approval request	Calendar Week 16 / 2010
1-	

Volkswagen, EASZ, 3-09-2010 page 1 of 1



## Air Resources Board

Robert F. Sawyer, Ph.D., Chair 9480 Telstar Avenue, Sulte 4 El Monte, California 91731 www.arb.ca.gov



June 1, 2007

Reference No. E-07-109

Mr. Norbert Krause, Manager Volkswagen of America, Inc. Mail Code EEO 3800 Hamlin Road Auburn Hills, MI 48326

Post-It® Fax Note 7671	Date # of pages ►
To Bob Hart	From Deter 10
Co./Dept. VW	CO. ARB
Phone #	Phone 26) 459-4292
Fax 1248) 754-420	Fax il

SUBJECT: Approval of Volkswagen's (VW) On-Board Diagnostics II (OBD II) System Design for 2007 Model Year Test Groups 8VWXV02.5257 and 8VWXV02.5253

Dear Mr. Krause:

The Air Resources Board's (ARB) Engineering Studies Branch has received the OBD II system descriptions submitted by VW for the 2008 model year test groups listed above. Representations made in the application indicate that the systems are compliant with the OBD II regulation. Therefore, ARB approves the 2008 model year systems with no deficiencies. However, the staff does have concerns regarding rear oxygen sensor monitoring, and manifold absolute pressure (MAP) sensor monitoring which were discussed in previous ARB approval letters (Reference No. E-05-188 and E-06-078). Staff understands VW is working to address the rear oxygen sensor monitoring and MAP sensor monitoring concerns. The staff also has concerns regarding front oxygen sensor monitoring as discussed below.

VW's current front oxygen sensor response monitor compares the actual sensor signal to a modeled "threshold" sensor signal. The monitor evaluates the sensor signal over 12 cycles (i.e., lambda modulation and corresponding switches of the sensor from lean to rich and back to lean). VW representatives have explained that the sensor cycle time is a function of both sensor deterioration and catalyst aging and typical cycle time ranges from 1 to 10 seconds which would yield a worst case monitoring time of 120 seconds. While VW representatives believe that this monitoring time is reasonable and will occur in-use, staff is concerned that, as the oxygen sensor malfunctions and progressively deteriorates, the cycle time could be significantly longer and consequently the time required to collect 12 cycles of the sensor signal would affect monitoring frequency and hinder detection of malfunctions in-use. This concern also applies to other test groups that require a specified number of cycles for the oxygen sensor

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: http://www.arb.ca.gov.

California Environmental Protection Agency

Mr. Krause June 1, 2007 Page 2 of 2

monitor (e.g., test group 8ADXV05.2385 requires 40 cycles). Staff believes a secondary measure (e.g., the monitor would detect a malfunction if 12 cycles have not been achieved in 120 seconds of monitoring time) is necessary to account for long cycle times and ensure detection of sensor malfunctions that result in longer cycle times. In order to avoid a deficiency determination on future model year vehicles, VW is required to investigate improvements to this monitoring strategy and propose an implementation schedule for staff approval.

Should you have questions or comments regarding this letter, please have your staff contact Mr. Peter Ho at (626) 459-4392.

Sincerely,

Steve Albu, Assistant Chief Mobile Source Control Division

Michael J. Rogert for SAA

cc: Mr. Peter Ho
Engineering Evaluation Section

OBD Summary Table MY 11

Issue Date 03-09-2010 Engine Code CBTA

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ant / System Fault Code Monitor Strategy Description

		icacy	current driving cycle					
			no misfire					
		not active	SAS					
		ready	O2S rear					
		ready	O2S front					
		3.00 [-]	number of checks					
		not at min or max limit	lambda control					
		closed loop	lambda control					
		< 1 [s]	out of lambda range					
			and lambda value					
		<   0.05   [-]	range between lambda set value					
		12003320 [rpm]	engine speed					
		not high	evap purge loading					
		14.3065.30[%]	engine load					
			gas temp. in catalyst system					
		> 450[°C]	filtered minimum modeled exhaust					
		> 120.0[s]	for time					
			temp. in catalyst system					
		> 400 [°C]	minimum modeled exhaust gas					
			catalyst system, upper range					
		1000 [°C]	modeled exhaust gas temp. in					
			catalyst system, lower range					
		560860 [°C]	modeled exhaust gas temp. in					
		c < 50 [K]	modeled exhaust gas temp. dynamic					
		150.00 [kg/h]	exhaust gas mass flow, upper range					
			exhaust gas mass flow, lower range					
		< 25.00 [kg/h]	delta exhaust mass flow					
	0.00	> 5.0 [s]	time after dew point					
2 DCY	25.0 [s]			< 1.00 [-]	measured OSC (HC and NOx-			
					measured OSC / OSC of borderline catalyst	measure of OSC compared to OSC of borderline catalyst	P0420	Catalyst System
	Time Length					11.7		
MIL IIIum.		Enable Condition	Secondary Parameters	Threshold Value	Malfunction Criteria	Monitor Strategy Description	Fault Code	Component / System
							-	

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the standard of the standard								
Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring	MIL Illum.
Misfire	P0300	crankshaft speed fluctuation (single emission threshold misfire rate (MR)	emission threshold misfire rate (MR)	> 3[%]	active after engine start	idle - 150 [rpm] + 1		2 DCY
		or multiple)					continuous	
	P0301		catalyst damage misfire rate (MR)	> 2.524 [%]	engine speed range	5006250 [rpm]	200 [rev]	immediately
	P0302				engine torque			
	P0304				IAT ·	> -48[°C]		
	P0305				ECT @ start	> -48[°C]		
	P0303				fuel cut off	not active		
					rough road	not detected		
<b>EVAP Purge Valve</b>	P0444	open circuit	signal voltage	4.705.40 [V]	evap purge valve	commanded off	0.5 [s]	2 DCY
						_	continuous	
					engine speed	> 80 [rpm]		
	P0458	short to ground	signal voltage	0.03.26 [V]	evap purge valve	commanded off	0.5 [s]	2 DCY
						_	continuous	
					engine speed	> 80 [rpm]		
	P0459	short to battery plus	signal current	> 2.20[A]	evap purge valve	commanded on	[s] 5.0	2 DCY
						_	continuous	
					engine speed	> 80 [rpm]		

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OBD-Group BVVV-15 Les	st-Group BVVVXV	OBU-Group BVVV-Ib Test-Group BVVVXVU2.5U35 Revision Date					
Component / System	Fault Code	Monitor Strategy Description	2011	Threshold Value	Secondary Parameters E	Enable Condition M	Monitoring MIL Illum. Time Length
EVAP Purge Valve	P0441	functional check stuck open	actual evap pump current difference between reference measurement to idle	> 1.70[-]	ECT	> 60 [°C] 4	4.5 [s]   2 DCY once / DCY
			divided by		ECT @ start	< 60 [°C]	
			pump current difference from the last leak detection phase during		ambient air temperature altitude	< 35; > 4 [°C] <= 2700 [m]	
			engine off		time since engine start	>= 600.0 [s] > 2 [a]	
					purge stop	۷ <u>۱</u>	
					monitoring run	<u> </u>	
					intake manifold vacuum	> 100.00 [hPa]	
					delta vehicle speed	< 120; >= 0[km/n] <= 30[km/h]	
					fuel volume flow	<= 5.00 [ml/s]	
					at least one leak detection monitor	preceding	
					engine	not idle	
					no fuel cut off	[md1] 07 <	
					no gear shift		
					O2S front	ready	
	DOAA1	functional phonk attack close	drop of even pump current	√ 1 [m A]	evap purge valve	commanded off	
	-		100 C C C C C C C C C C C C C C C C C C	- Line 1	-		once / DCY
			within time	12.0[s]	ECT @ start ambient air temperature	< 35: > 4 [°C]	
					altitude	<= 2700 [m]	
					ime since engine start integrated evap purge flow since last	>= 600.0[s] > 2[g]	
					purge stop	, E	
					monitoring run	[9]	
					intake manifold vacuum	> 100.00 [hPa] < 120: >= 0 [km/h]	
					delta vehicle speed	<= 30 [km/h]	
					tuel volume flow	<= 5.00 [ml/s]	
					during engine off	C e c e c e c e c e c e c e c e c e c e	
					increase of evap pump current from	>= 0.3 [mA]	
					within time	< 17 [s]	
					engine	not idle	
					engine speed no fuel cut off	> 20 [rpm]	
					no gear shift		
					no engine stop	readv	
					evap purge valve	commanded on	

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Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Inreshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL IIIum.
EVAP System Small Leak	P0442	pressure check	modeled pressure from pump	< 9.00 [hPa]	engine temperature @ engine start	>= 4 [°C]	400.0 [s]	2 DCY
					difference between ECT and IAT @	<= 15 [K]		
					ambient air temperature	< 35; > 4 [°C]		
					altitude	<= 2700 [m]		
					time since engine start in preceding	>= 600.0 [s]		
					dcy	_		
					change in battery voltage during	< 1.00 [V]		
					monitoring			
					engine off time	>= 5.0 [s]		
					venicle speed	√ 5 00 [-]		
					no sudden change in evap pump	< 2: > -1 [mA]		
					current (filling event)			
					deviation of filtered evap pump	<= 1 [mA]		
					current durring reference			
					measurement within range			
					change in relative evap pump	n.a.		
					within time	ב- ט		
					(during ECM keep alive-time after	< 900.0 [s]		
					ignition off, max. time)	_		
					airbag	not activated		
					(after MIL illumination because of	1 dcys		
					any EVAP leakage the monitor is			
	_	-	_	_	only activated every)	_		

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ant / System Fault Code Monitor Strategy Description

	Crodb D v v v v	Cop-Cloab passelo rest Cloab passes version passes						
Component / System	Fault Code	Monitor Strategy Description	Maltunction Criteria	I hreshold Value	Secondary Parameters	Enable Condition   M	Monitoring MIL IIIum. Time Length	lum.
EVAP Leak Detection Pump	P043E	out of range high during engine off	evap pump current during reference measurement	> 40 [mA]	engine temperature @ engine start	>= 4 [°C] 10	10.0 [s] 2 DCY once / DCY	~
					difference between ECT and IAT @	<= 15 [K]		
					ambient air temperature	< 35; > 4 [°C]		
					altitude time since engine start in preceding	<= 2700 [m] >= 600.0 [s]		
					dcy change in battery voltage during	< 1.00 [V]		
					monitoring	1 1 1		
					vehicle speed	>= 5.0 [s] 0 [km/h]		
					evap purge adaptation	< 5.00 [-]		
					deviation of filtered evap pump	<= 1 [mA]		
					current durring reference			
					change in relative evan numn	<u> </u>		
					current during monitoring			
					(during ECM keep alive-time after	n.a. < 900.0[s]		
					ignition off, max. time)			
					airbag	not activated		
					any EVAP leakage the monitor is	-		
	P043F	out of range low during engine off	evap pump current during reference	< 15 [mA]	engine temperature @ engine start	>= 4 [°C] 10	10.0 [s] 2 DCY	
			measurement				once / DCY	
					difference between ECT and IAT @	<= 15 [K]		
					ambient air temperature	< 35; > 4 [°C]		
					altitude	<= 2/00 [m]		
					doy	)- 000.0[s]		
					change in battery voltage during	< 1.00 [V]		
					engine off time	>= 5.0 [s]		
					vehicle speed	0 [km/h]		
					evap purge adaptation deviation of filtered evap pump	<= 1 [mA]		
					current durring reference measurement within range			
					change in relative evap pump	⊐.aa.		
					current during monitoring	i		
					within time	n.a.		
					(during ECM keep alive-time after ignition off, max. time)	< 900.0[s]		
					airbag	not activated		
					any EVAP leakage the monitor is	lacys		
					only activated every)			

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•								
Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
EVAP Leak Detection Pump	P2407	signal check during engine off	fluctuation of evap pump current	> 1 [mA]	engine temperature @ engine start	>= 4 [°C]	800.0 [s]	2 DCY
			during reference measurement or		difference between ECT and IAT @	<= 15[K]	once / DCY	
					engine start			
			drop of evap pump current during phase	> 6 [mA]	ambient air temperature	< 35; > 4 [°C]		
			for time	>= 3.0[s]	altitude	<= 2700 [m]		
					time since engine start in preceding	>= 600.0 [s]		
					change in battery voltage during	< 1.00 [V]		
					monitoring			
					engine off time	>= 5.0 [s]		
					vehicle speed	0 [km/h]		
					evap purge adaptation	< 5.00 [-]		
					deviation of illered evap pump	>=   [mA]		
					measurement within range			
					change in relative evap pump	n.a.		
					current during monitoring			
					within time	n.a.		
					(during ECM keep alive-time after	< 900.0 [s]		
					ignition off, max. time)			
					airbag	not activated		
					(after MIL illumination because of	1 dcys		
					any EVAP leakage the monitor is			
					only activated every)			

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Test System

IEant Code | Manifer Strategy Description

			EVAP Leak Detection Pump				EVAP Leak Detection Pump		
P2400	P2401		P2402		P0447	P0448	P0448		P2450
open circuit	short to ground		short to battery plus		open circuit	short to ground	short to battery plus		rationality check during engine off
signal voltage	signal voltage	or  pump stuck signal voltage at evap pump current measuring resistor	short circuit signal voltage at evap pump current measuring resistor		signal voltage	signal voltage	signal current		evap pump current difference between reference measurement to idle
> 4.75.4 [V]	< 2.743.26 [V]	> 1.80 [V]	> 4.00 [V]		> 4.75.4 [V]	< 2.743.26 [V]	> 2.24.0 [A]	and the second s	<= 3 [mA]
evap pump electric drive	evap pump electric drive		evap pump electric drive		evap pump solenoid valve	evap pump solenoid valve	evap pump solenoid valve		engine temperature @ engine start difference between ECT and IAT @ engine start ambient air temperature altitude time since engine start in preceding dey change in battery voltage during monitoring engine off time vehicle speed evap purge adaptation no sudden change in evap pump current (filling event) deviation of filtered evap pump current during reference measurement within range change in relative evap pump current during monitoring within time (during ECM keep alive-time after ignition off, max. time) airbag (after MIL. illumination because of any EVAP leakage the monitor is only activated every)
commanded off	commanded off		commanded on	announce of the second	commanded off	commanded off	commanded on		>= 4 [°C] <= 15 [K] < 35; > 4 [°C] <= 2700 [m] >= 600.0 [s] < 1.00 [V] >= 5.0 [s] 0 [km/h] < 5.00 [-] < 2; > -1 [mA] n.a. c 900.0 [s] not activated 1 doys
0.5 [s] continuous	0.5 [s] continuous		0.5 [s] continuous	continuous	0.5 [s]	0.5 [s]	0.5 [s] continuous		Time Length 13.5 [s] once / DCY
2 DCY	2 DCY		2 DCY		2 DCY	2 DCY	2 DCY		2 DCY

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Part / System

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Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
EVAP Leak Detection Pump	P240C	short to battery plus	signal current	> 2.24.0 [A]	evap pump heater	commanded on	0.5 [s] continuous	2 DCY
	P240B	short to ground	signal voltage	< 2.743.26 [V]	evap pump heater	commanded off	0.5 [s] continuous	2 DCY
	P240A	open circuit	signal voltage	> 4.75.4 [V]	evap pump heater	commanded off	0.5 [s] continuous	2 DCY
and the second s							access of the Section	
Fuel System	P2096	out of range	I-portion of 2nd lambda control loop	<-0.040[-]	modeled exhaust gas temp.	4001000 [°C]	30.0 [s] continuous	2 DCY
					exhaust gas mass flow	18.00180.00 [kg/h]		
					lambda control	not at min or max limit		
					2nd lambda control	closed loop		
					O2S FOR	ready		
					O2S heater front	active		
					O2S heater rear	active		
					fuel cut off	not active		
					sAl	not active		
	P2097	out of range	l-portion of 2nd lambda control loop	> 0.040[-]	modeled exhaust gas temp.	4001000 [°C]	30.0 [s]	2 DCY
					exhaust gas mass flow	18.00180.00 [kg/h]		
					lambda control	closed loop		
					2nd lambda control	closed loop		
					O2S front	ready		
					O2S hoster front	ready		
					O2S heater rear	active		
					fuel cut off	not active		
					catalyst heating	not active		
					SAI	not active		

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ant / System

Fault Code | Monitor Strategy Descript

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
	1							
Fuel System	P2187	system too lean @ idle	adaptive value	> 5.02 [%]	number of injections after engine	> 1500 [-]	40.0 [s]	2 DCY
					engine speed	< 860 [rpm]	001111111111111111111111111111111111111	
					mass air flow	< 35 [kg/h]		
					ECT	> 59 [°Č]		
					IAT	< 85 [°C]		
					ratio manifold pressure to ambient	> 0.20[-]		
					pressure			
					or			
					valve overlap	< 40.00 [°CRK]		
					delta part load adaptation	ready		
					lambda control	closed loop		
					evap purge valve	closed		
	P2188	system too rich @ idle	adaptive value	< -5.02 [%]	number of injections after engine	> 1500 [-]	40.0 [s]	2 DCY
					start		continuous	
					engine speed	< 860 [rpm]		
					FOT	/ 50 [R9/1]		
						, 29 C		
						, , , , , ,		
					ratio manifold pressure to ambient	-102.0 <		
					piessuie			
					or			
					valve overlap	< 40.00 [*CRR]		
					delta part load adaptation	ready		
					lambda control	closed loop		
					evap purge valve	closed		
	P2177	system too lean @ part load	adaptive value	> 28 [%]	number of injections after engine	> 1500 [-]		2 DCY
					start		continuous	
					engine speed	13204600 [rpm]		
					engine load	25100 [%]		
					mass air flow	45300 [kg/h]		
					ECT	> 59 [°C]		
					IAT	< 85 [°C]		
					ratio manifold pressure to ambient	> 0.20 [-]		
					pressure			
					or			
					valve overlap	< 40.00[[°CRK]		
					lambda control	closed loop		
					evap purge valve	closed		

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Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL IIIum.
	P2178	system too rich @ part load	adaptive value	< -20 [%]	number of injections after engine start	> 1500[-]	25.0 [s] continuous	2 DCY
					engine speed engine load			
					ECT IAT	> 59 [°C]		
					ratio manifold pressure to ambient pressure	> 0.20 [-]		
					or			
					valve overlap	< 40.00 [°CRK]		
					evap purge valve	closed		
				and the second of the second o	Commendation of the Commen	Maria de la companya		
Leak to Intake Manifold	P2279	adaptation value monitoring	offset value throttle mass flow	> 13.00 [kg/h]	desired mass flow	0.0025.00 [kg/h]	10.0 [s] multiple	2 DCY
					evap purge valve EGR	closed off		
Oxygen Sensors front	P2414	signal range check (check for sensor at ambient air)	threshold 1: signal voltage	3.104.77 [V]	lambda set value O2S ceramic temp.	< 1.6 [-] > 715 [°C]	15.0 [s]	2 DCY
			threshold 2:		fuel cut off	not active		
			signal voltage	2.503.06 [V]	heater control	closed loop		
			Depending on gain factor, that		SAI	not active		
		_	actual is used for sensor		In low tuel signal then wait	>0.0[8]		

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ent / System Fault Code | Monitor Strategy Description

		> 0.6[[V]	O2S rear voltage					
		> 1.0 [-]	O2S front					
		at max limit	1st lambda control loop					
		. 0.1	Case 3:					
		< 0.4 [V]	O2S rear voltage					
		at min limit	1st lambda control loop					
			Case 2:					
		active	2nd lambda control loop					
		not at min or max limit	1st lambda control loop					
		ווטר מכנואפ	Case 1:					
		not active	catalyst heating					
		not active	fuel cut off					
		ready	O2S heater rear					
		ready	O2S heater front					
		ready	O2S rear					
		ciosed loop	210 lambda como					
		closed loop	lambda control					
		18.00180.00 [kg/h]	exhaust gas mass flow					
		n.a.	delta engine load					
	multiple				loop			
2 DCY	30.0 [s]	4001000 [°C]	modeled exhaust gas temp.	[-] 280.0- >	delta lambda of 2nd lambda control	out of range	P2196	
		> 0.6 [V]	O2S rear voltage					
		> 1.0[-]	O2S front					
		at max limit	1st lambda control loop					
		, c:	Case 3:					
		< 0.4 [V]	O29 rear voltage					
		< 1.0[-]	O2S front					
		at min limit	1st lambda control loop					
		active	2nd lambda control loop					
		not at min or max limit	Case 1:					
		not active	SAI					
		not active	catalyst heating					
		not active	fuel cut off					
		ready	O2S heater rear					
		ready	O2S heater front					
		ready	O2S rear					
		ready	O2S front					
		closed loop	2nd lambda control					
		closed loop	lambda control					
		18 00 180 00 [kg/h]	exhaust gas mass flow					
	multiple	3			loop			
2 DCY	30.0 [s]	4001000 [°C]	modeled exhaust gas temp.	> 0.065 [-]	delta lambda of 2nd lambda control	out of range	P2195	Oxygen Sensors front
	Time Length							
MIL IIIum	Monitorina	Enable Condition	Secondary Parameters	Threshold Value	Malfunction Criteria	Fault Code     Monitor Strategy Description		Component / System

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onent / System Fault Code Monitor Strategy Description

	Oxygen Sensors front																																				Oxygen Sensors front	Component / System
	P0130																																				P0133	Fault Code
	out of range																																			and gradient ratio	response rate monitoring, area ratio   SYMMETRIC FAULT:	Monitor Strategy Description
	O2S ceramic temp.	ZZ MIG CZZ	lower value of both gradient ratios	or	and L2R	lower value of both area ratios R2L	gradient ratio	gradient ratio	Transient Time:	and L2R	lower value of both area ratios R2L	gradient ratio	Delay Time:	ratio R2L and L2R	values of both counters for area	area ratio	difference of R2L area ratio vs. L2R	ASYMMETRIC FAULT:	R2L and L2R	lower value of both gradient ratios		or	and L2R	lower value of both area ratios R2L	gradient ratio	gradient ratio		Transient Time:	and L2R	lower value of both area ratios R2L	gradient ratio	Delay Time:	ratio R2L and L2R	area ratio	difference of R2L area ratio vs. L2R		SYMMETRIC FAULT:	Malfunction Criteria
	< 640 [°C]		< 0.25[-]			< 0.25 [-]	<= 0.40 [-]	>= 0.25[-]			< 0.25 [-]	>= 0.25 [-]			>= 4 times		NOT (-1.001.00)[-]			< 0.25 [-]				< 0.25 [-]	<= 0.40[-]	>= 0.25[-]				< 0.25[-]	>= 0.25[-]		1 + H	/ <del></del>	-1.001.00[-]			Threshold Value
fuel cut off	modeled exhaust gas temp.	ethanol concentration adaptation	only Flex fuel systems without	open circuit pump current (IP)		fuel cut off for any cylinders	diagnosis evap purge system	tank leakage detection	SAI		forced lambda oscillation	2nd lambda control loop	evap purge		or		evap purge	gear shifting		time since last measurement	applied compensation and evap	relative fuel amount from wall-	diagnostic fuel steps	lambda control set-point prior to	catalyst temperature	ECT	calculation	gradient of exhaust system lag time	· ·	exhaust system lag time calculation	gradient of engine load	engine load	eigile speed	reaginess	O2S front - time since operation	temperatur is reached	O2S front - min. operation	Secondary Parameters
not active	> 300 [°C]	not active		ready		not active	not active	not active	not active		not active	not active	> 2.0 [s]				not active	n.a.		> 3.0 [s]		<= 0.1[-]	stoichiometric	A/F-Ratio	>= 450 [°C]	>= 62 [°C]	3	<= 0.0 [s]		0.10.5[s]	<= 4 99 [%]	13 99 70 01 [%]	[[[]]]	1160 3730 [553]	> 40.0 [s]		> 720 [°C]	Enable Condition
	15.0 [s] multiple																																	once / DC Y	107.0 [s]			Monitoring Time Length
	2 DCY																																		2 DCY			h MIL Illum.

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Component / System  Oxygen Sensors front	Fault Code Monitor: P2251 open circ P2243 open circ P2243 open circ	Monitor Strategy Description  Open circuit virtual mass (VM)  Open circuit virtual mass (VM)  Open circuit nernst voltage (UN)  Open circuit nernst voltage (UN)  Open circuit nernst voltage (UN)  Open circuit adjustment voltage (IA)   ve ve ve	Threshold Value  1.471.53 [V]  > 950 [Ohm]  > 4.70 [V]  > 950 [Ohm]  < 0.20 [V]  > 950 [Ohm]  > 950 [Ohm]  > 4.77 [V]	Secondary Parameters   1.471.53 [V]   modeled exhaust gas temp.	Secondary Parameters	
	P2626	open circuit adjustment voltage (IA)	and internal resistance O2S signal front	> 950 [Ohm] > 4.77 [V]	lm[	mg
	P2237	open circuit pump current (IP)	O2S signal front  and delta lambda controller	1.491.51 [V] >   0.10   [-]		O2S ceramic temp. lambda modulation lambda control heater control
	P0132	signal range check	short to battery virtual mass (VM)	> 3.25 [V]		
			nernst voltage (UN) or	> 4.40 [V]	> 4.40 [V]	> 4.40 [V]
			adjustment voltage (IA)  or adjustment voltage (IP)	> 7.00 [V]	> 7.00 [V]	> 7.00 [V]
	P0131	signal range check	short to ground virtual mass (VM)	< 1.75 [V]	< 1.75 [V]	< 1.75 [V] 5.0 [s] multiple
			or nernst voltage (UN)	< 1.50 [V]	< 1.50 [V]	< 1.50 [V]
			adjustment voltage (IA)	< 0.30 [V]	< 0.30 [V]	< 0.30 [V]
			adjustment voltage (IP)	< 0.30 [V]	< 0.30[V]	< 0.30 [V]

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							I Ime Length	
Oxygen Sensors rear 2-Point-LSF P0137	P0137	₹	signal voltage	< 0.06 [V]	case 1: sensor ready for		3.0 [s]	2 DCY
		(snort to ground, core connection			operation		multiple	_
		signal wires)	for time	> 3.0 [s]	sensor voltage	<= 0.40 [V]		
_			difference of sensor voltage with	< 0.01 [V]	sensor voltage	0.50 1.08 [V]		
			load pulse and voltage without load	r L	case 2: sensor theoretical ready	F		
			pulse (mean value of 3		for operation			
			measurements)		for time	> 12.0 [s]		
					sensor sufficient heated up if	_		
					exhaust temperature	>= 1263[°C]		
					for time	> 18.0 [s]		
					or .	9		
					heater power	>= 24 [%]		
					io allia	10.0		
					dew point exceeded			
					fuel cut off	not active		
					catalyst purge	not active		
	P0138	O2S signal check - out of range high signal voltage	signal voltage	> 1.08 [V]	case 1: sensor ready for		5.0 [s]	2 DCY
		(short to pattery plus)	:	1	operation	)	multiple	
			for time	> 5.0[s]	sensor voltage	<= 0.40 [V]		
					sensor voltage	0.501.08 [V]		
					case 2: sensor theoretical ready			
					for operation	> 12.0 [6]		
					sensor sufficient heated up if			
					exhaust temperature	>= 1263 [°C]		
					for time	> 18.0 [s]		
					or			
					heater power	>= 24 [%]		
					for time	> 18.0 [s]		
					general:			
					dew point exceeded			

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IFault Code | Monitor Strategy Descrip

P2271	Owner Concert Boint   CE															Oxygen Sensors rear 2-Point-LSF P0140	Component / System
P2271	02270							P0140								P0140	Fault Code
enrichment)  stuck rich (if sensor stuck rich: enleanment) if enleanment is not successful: waiting for next fuel cut off	Ctuck loop (if coppore thick loop:							O2S signal check - circuit continuity (sensor ground line open circuit)								O2S signal check - circuit continuity (sensor signal line open circuit)	Monitor Strategy Description
reference enrichment after stuck lean  O2S signal rear not oscillating at reference and enleanment after stuck rich	Ose signal pass pat passing at						and exhaust temperature	internal resistance					puise (mean value of 3 measurements)	difference of sensor voltage with load pulse and voltage without load	for time and	signal voltage	Malfunction Criteria
20 [%] > 0.640.65 [V] 15 [%]	ZOBA OBEÍNA						> 670 [°C]	> 40000 [Ohm]						>= 2.80 [V]	> 3.0 [s]	0.400.60[V]	Threshold Value
modeled exhaust gas temp. O2S rear readiness 2nd lambda control mass air flow modeled exhaust gas temp. O2S rear readiness fuel cut off 2nd lambda control	3000	general: dew point exceeded valid Ri-measurements	<b>or</b> heater power for time	exhaust temperature for time	tor operation for time sensor sufficient heated up if	sensor voltage case 2: sensor theoretical ready	sensor voltage <b>or</b>	case 1: sensor ready for operation	general: dew point exceeded	heater power for time	or time	exhaust temperature	tor operation for time	sensor voltage  case 2: sensor theoretical ready	sensor voltage or	case 1: sensor ready for operation	Secondary Parameters
22.00120.00 [Kg/h] 22.00120.00 [Kg/h] > 3.0 [°C] > 10.0 [s]  closed loop	22.00 120 00[1/2/6]	> 10 times	>= 24 [%] > 18.0 [s]	>= 1263 [°C] > 18.0 [s]	> 12.0 [s]	0.501.08 [V]	<= 0.40 [V]			>= 24 [%] > 18.0 [s]	> 18.0 [s]	>= 1263 [°C]	> 12.0 [s]	0.501.08 [V]	<= 0.40[V]		Enable Condition
once / DCY	245 0 [6]							30.0 [s] multiple								30.0 [s] multiple	Monitoring Time Length
2 DCY	la DCV							2 DCY								2 DCY	MIL Illum.

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		Collingation of	licatol					
	continuous		7					
2 DCY	0.5 [s]	> 80 [rpm]	engine speed	> 3.59[V]	heater voltage	short to battery plus	P0038	
		commanded off	heater					
2 DCY	0.5 [s] continuous	> 80 [rpm]	engine speed	< 2.34 [V]	heater voltage	short to ground	P0037	
		commanded off	heater					
1	continuous	ر در المانا		1.0.0.00	- VC	000000000000000000000000000000000000000	0	Point-LSF
lo DCV	0 5 [e]	> 80[mm]	engine speed	234 3 59 NJ	heater voltage	open circuit	POOR	Ovicen Sensors Heater rear 2-
	and the second that the second	and the first of the formation of the first	and file of the planter of the property of the party of t	Commence of the second of the	Marian Manian Marian Marian Marian Marian Marian Marian Marian Marian Ma			
		commanded on	heater					
		50+00+100	fiel out of					
		10 00 [-]	number of checks					
		000:0	ignition off)					
		> 120.0 [s]	engine shut-off-time					
	multiple							Point-LSF
2 DCY	6.0 [s]	300680 [°C]	modeled exhaust gas temp.	> 120032400 [Ohm]	heater resistance	out of range	P0141	Oxygen Sensors Heater rear 2-
		\ 000:0[8]	ignition off)	33:0[S]	uille aitei Ozo lleatei oli			
		V E00 0 [5]	engine snut-on-time	35.0	and			
	ilidiribid	7 200	and the second s					
2 DCY	35.0 [s]	> -10 [°C]	ECT @ start	<715[°C]	o) 02S ceramic temp.	rationality check (sensor heating up) O2S ceramic temp.	P0135	
				> 90.00[%]	heater duty cycle			
		active	heater control		and			
Z DCY	multiple	> 550 [°C]	modeled exhaust gas temp.	< /201°C]	O2S ceramic temp.	out of range high	P0135	Oxygen Sensors Heater front
		commanded on	heater					
2 DCY	0.5 [s] continuous	> 5 [s]	time after engine start	> 5.50[A]	signal current	short to battery plus	P0032	
		commanded off	heater					
(	snon	3						
7 DCY	0.5 [s]	> 5 [s]	time after engine start	0.0 3.26 M	heater voltage	short to around	P0031	
	0010110000	commanded off	heater					
2 DCY	0.5 [s]	> 5 [s]	time after engine start	4.705.40 [V]	heater voltage	open circuit	P0030	Oxygen Sensors Heater front
	Time Length	9.4						
MIL IIIum.	Monitoring	Enable Condition	Secondary Parameters	Threshold Value	Malfunction Criteria	Monitor Strategy Description	Fault Code	Component / System
						(VOC. JOJJ (Keylajo)) Date	Colomb DA ***	

_	0000 (s)	frequency					
	50150 [km/h] 32.00352.00 [kg/h]	vehicle speed mass air flow					
		driving condition H:					
	3 times	frequency					
	4.0040.00 [kg/h] > 10.0 [s]	mass air flow time required /					
	020 [km/h]	vehicle speed					
	> -45 [°C]	substitute ECT					
	105141 [°C] detected	ECT cold start					
70.0 [s] once / DCY	temp 01 50141 [°C]	@ start	thres 01[f(ECT)]: 2 [K]	no change on signal	stuck high	P0116	
2.0 [s] multiple	2		> 140 [°C]	ECT	short to ground	P0117	
2.0 [s] multiple			<-40[°C]	ECT	short to battery / open circuit	P0118	Engine Coolant Temperature Sensor
							CONTRACTOR STATES OF STATE
100.0 [s] once / DCY	> 21600.0 [s]	engine off time			detection by engine off timer		Cold Start Detection
			alianananananananananananananananananana				
	> 0.55 [V]	sensor voltage at start of measurement					
	-500.00500.00 [kg/h]	exhaust mass flow dynamic within					
	ready	oscillation check					
	>= 2.0 [s]	after time since fuel cut off at first cylinder					
		signal					
	< 8.00 [-]	deviation between expected and	>= 1.0 [-]	number of checks			
	>= 430 [°C]	exhaust temperature at sensor		and			
	>= 5.0 [s]	time after last fuel cut off O2S rear	> 20003500 [mg]	after oxygen mass flow (after fuel cut off)			
10.0 [s] multiple	<= 90.0 [s]	time of fuel cut off	>= 0.15[V]	sensor voltage of	check of response time at fuel cut off	) P2271	Oxygen Sensors rear (binary LSF) P2271
Time Length							
Monitoring	Chaple Condition	Occurrent i arametera	1 modified value				Company of Com.

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ant / System Fault Code Monitor Strategy Descri

	4 0 [s]			> 11[K]	diff. reference model temperature	measured engine coolant temp.	P3081	Engine Coolant Temperature Sensor rationality
	Marie Barrell							
		once	frequency					
		> 40.0[s]	time required /					
		32.00352.00[kg/h]	mass air flow					
		50150 [km/h]	vehicle speed					
			driving condition H:					
			and					
		3 times	frequency					
		> 10.0[s]	time required /					
		4.0040.00[kg/h]	mass air flow					
		020 [km/h]	vehicle speed					
		,	driving condition L:					
		> -45 [°C]	substitute ECT					
		temp 03	(6)					
		50 141 FC	ECT @ start	F. 1	100111111111111111111111111111111111111			
		temp 01	order iigii	9 IK	no change on signal			
		farilt	strok biob					
2 DCY	100.0 [s]	detected	cold start	/5105[°C]	signal in range	stuck in range	P0116	
		once	requency	1	-			
		> 40.0 [s]	time required /					
		32.00352.00 [kg/h]	mass air flow					
		50150 [km/h]	vehicle speed					
			driving condition H:					
			and					
		3 times	frequency					
		> 10.0 [s]	time required /					
		4.0040.00 [kg/h]	mass air flow					
		0 20 km/h]	vehicle speed					
		> -45[°C]	substitute ECT					
		temp_02						
		detected	cold start					
	0		ECT					
V DC 1	once / DCY		EC   @ stall	2	no change on signal			Sensor
	700			thres 01[f(ECT)]:		stuck low	P0116	Engine Coolant Temperature
n WIL HOIL	Time Length	Eliable Collulion	Secondary Farameters	Illiestion value	Manuficuoti Citteria	Infolition Strategy Description	r auit Code	Component System
Adil III.	Monitorina	Example Condition	Coopedon Boromotoro	Throchald Volus		t / Control	Earlt Cada	Pompoport / System

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				> 13.49[[°CRK]	permissible deviation			
	ii die pic				Or .			
2 DCY	10 [rev]			<-13.49[°CRK]	permissible deviation	angular offset check	P0016	Camshaft Position Sensor Inlet
			Anna anna anna ann an an an an an an ann a	To the San				
				no signal	engine speed			
, C	multiple				callionali signals	פוטומו מכוועווץ כוופכה	70322	
	OF CI			failure	monitoring reference gap		0000	
	muliple				or			
2 DCY				incorrect	counted teeth vs. reference	rationality check	P0321	RPM Sensor
Contract of the second					alahan (1995) di Santan Sa			Commence of the contract of th
	Collulidods			8.00[-]	defect counter			
2 DCY				incorrect	signal pattern	rationality check	P0341	
				8.00 [-]	crankshaft signals			
	continuous				and			
2 DCY				permanently low	signal voltage	rationality check	P0342	
				8[-]	crankshaft signals			
	snor							
2 DCY	0.5 [s]			permanently high	signal voltage	rationality check	P0343	Phase Sensor 1
acacacacacae) Saco								Commence of the Commence of th
		30120 [km/h]	average vehicle speed					
		35280 [kg/h]	average air mass flow					
			than					
			and min. observed AAT for more					
		412 [kg]	depending on temp. at engine start					
			than					
		120180 [8]	and min observed AAT for longer					
		100	engine temp. at start and AAI					
		413.5 [kg/h]	integrated air mass depending on					
		airmass 01:						
		1495[%]	engine load					
		not active	tuel cut off					
		-10[°C]	AAT					
		-1060 [°C]	ECT @ start		•			
		thers 02:			integral			
Z DC Y	once / DCY	ر] ادرا	engine temp.	[5]	after a sufficient air mass flow	expect range		
				thers 03:		m performance not in a	P2181	Coolant System Performance
F	Time Length	Liable Condition	Cocondat) Latametera	Tilleshold Value	Maild Chor Cilicia	Monitor Suategy Description	ò	Component Cystem
A All III	Monitoring	Enable Condition		Throchold Volvo	Molf-posion Oritoria			Component / Syletom

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OBD-Group BVW-I5 Test-Group BVWXV02.5U35 Revision Date	t-Group BVWX	V02.5U35 Revision Date						
Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
VVT Actuator Intake	P0010	open circuit	signal voltage	4.705.40[M]	camshaft valve	off	0.5 [s] continuous	2 DCY
					engine speed	> 80 [rpm]		
	P2088	short to ground	signal voltage	0.03.25[V]	camshaft valve		0.5 [s] continuous	2 DCY
					engine speed	> 80 [rpm]		
	P2089	short to battery plus	signal current	> 2.20 [A]	camshaft valve		0.5 [s]	2 DCY
							continuous	
					engine speed	> 80[[rpm]		
VVT Actuator Intake	P000A	slow response	difference between target position vs. actual position	>  8.0012.00  [°CRK]	time after engine start	> 1.510.0 [s]	21.0 [s] multiple	2 DCY
			for time	> 1.82.5 [s]	engine speed	6006000 [rpm]		
			and		oil temperature	-48143[°C]		
			adjustment angle	>=   3.00   [°CRK]	frequency (normal operation)	Se		
	100	target error	difference between target position vs. actual position	>  8.0012.00  ["CRRJ	time atter engine start	v	z i. 0 [s] multiple	ZUCY
			for time	> 1.82.5 [s]	engine speed			
			and		oil temperature	-48143[°C]		
			adjustment angle	<   3.00   [°CRK]	frequency (normal operation)	/ times		
	-							
Altitude Sensor	P0606	plausibility check	signal gradient	> 50.00 [hPa]			2.0 [s]	2 DCY
	P0606	plausibility check	signal gradient	< -50.00 [hPa]			2.0 [s]	2 DCY
							multiple	
							No. of the second	
Altitude Sensor	P0606	short to battery / open circuit	signal voltage	> 4.88[V]			0.2 [s]	2 DCY
	70000	obout to around	201	V 0 00 0			0.0 [6]	3 700
	P0606	short to ground	signal voltage	< 0.20 [V]			0.2 [s] multiple	2 DCY
Manifold Pressure Sensor	P0107	short to ground	signal voltage	< 0.20 [V]			1.0 [s]	2 DCY
	D0100	short to bottom / opposition;	2:252	> 4 06 1/1			10[6]	3000
	0	silor to patterly oberrollogic	ordinal voltage				continuous	0
	-							

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OBD-Group BVVV-15 Test-	-Group BVVVX	OBU-Group BVVV-15 Test-Group BVVVXVU2.5U35 Revision Date						
Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL IIIum.
Manifold Pressure Sensor	P0106	rationality check low	difference manifold pressure - lower threshold model	< 0 [hPa]		n 2		2 DCY
			model range	45845[hPa]				
	P0106	rationality check high	difference manifold pressure - upper threshold model	> 0 [hPa]		n 2	2.5 [s] multiple	2 DCY
			model range	6401055 [hPa]				
	P0106	rationality check	diff. altitude sensor signal vs.	> 60.00 [hPa]	time after engine start	< 25.0 [s] 2		2 DCY
			manifold pressure signal at engine		-		multiple	
			start		engine speed	< 330 [rpm]		
	P0106	adaptation value monitoring	offset value manifold pressure for	> 55.00 [hPa]	driving condition range 1		2.5 [s]	2 DCY
			load calculation in driving condition		(omsna):		multiple	
			range 2		engine speed	5 00 25 00 [kg/h]		
					delta adaptation value range 1	< 0.10 [kg/h]		
					for time	1.0[s]		
					ariving condition range 2 (opsra):			
					engine speed	> 1400 [rpm]		
					delta adaptation value range 2	< 2.97 [hPa]		
					for time	8.0 [s]		
					driving condition range 3 (opua):			
					desired mass flow	> 40.00 [kg/h]		
					manifold pressure	> 550.00 [hPa]		
					della adaptation value range o	( 7.37 [III a]		
					general:	ر. اور		
					engine operation in every driving	>= 2 times		
					condition			
					engine speed	500 6000 [rpm]		
					manifold pressure	> 0.00 [hPa]		
					ratio manifold pressure to ambient	< 0.85 [-]		
				_	<u>  pressure</u>			

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_								
Companent System	l adit Code	Monton Suarely Description	Manuficuon Chiena	I III esticia value	Occordary Larameters	Lilable Collulation	Time Length	MIL MAINT.
Manifold Pressure Sensor	P0106	adaptation value monitoring	offset value manifold pressure for load calculation in driving condition range 2	< -60.00 [hPa]	driving condition range 1 (omsna): engine speed	< 800 [rpm]	2.5 [s] multiple	2 DCY
					desired mass flow	5.0025.00 [kg/h]		
					delta adaptation value range i for time	1.0[s]		
					driving condition range 2 (opsra):			
					engine speed	> 1400 [rpm]		
					manifold pressure	< 425.00 [hPa]		
					delta adaptation value range 2	< 2.97 [hPa]		
					for time	8.0[8]		
					driving condition range 3 (opua):			
					desired mass flow	> 40.00 [kg/h]		
					manifold pressure	> 550.00 [hPa] > 2 97 [hPa]		
					for time	5.0 [s]		
					engine operation in every driving	>= 2 times		
					condition			
					diagnosis evap purge system	not active		
					manifold pressure	> 0.00 [hPa]		
					ratio manifold pressure to ambient	< 0.85 [-]		
			_		Piessaie	_		
Boost Pressure Sensor	P0107	short to ground	signal voltage	< 0.20 [V]	engine speed	> 60 [rpm]	0.5 [s]	2 DCY
	P0108	short to battery / open circuit	signal voltage	> 4.86[V]	engine speed	> 60 [rpm]		2 DCY
			_	_		_	COLIBITIONS	
Intake Air Temperature Sensor	P0112	short to ground	IAT	> 130[c]			5.0 [s]	2 DCY
							multiple	
	P0113	short to battery / open circuit	IAT	< -46[°C]				2 DCY
		and the second of the second o				econecanistis managaaaaa		
Ambient Air Temperature Sensor	P0072	short to ground	ambient air temperature	> 87 [°C]	CAN	active		2 DCY
	P0070	short to battery / open circuit	ambient air temperature	< -50 [°C]	CAN	active	6.00 [s]	2 DCY
				-				
								Contraction of the Contraction o

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	Vehicle Speed				Ambient Air Temperature								Intake Air Temperature	Component/ System
	-T-													
	P0501				P0071								P0111	Fault Code
	plausibility check				cross check								cross check	Infonitor strategy Description
	vehicle speed		diff. AAT vs. ECT at engine start (depending on engine off time)	(depending on engine off time) and diff. IAT vs. AAT at engine start (depending on engine off time) and	diff. ECT vs. IAT at engine start					diff. AA I vs. EC I at engine start (depending on engine off time)	(depending on engine off time)	(depending on engine off time)  and	diff. ECT vs. IAT at engine start	Mairunction Criteria
	< 4 [km/h]		>  25  [K]	>  25  [K]	<  25  [K]					^ <u> 25                                   </u>	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		>  25  [K]	Inresnoid Value
engine speed ECT	fuel cut off	for time  solar radiation case 2:  IAT @ start  minus  IAT @ condition:  vehicle speed  for time	solar radiation case 1:  AAT @ start minus  AAT @ condition:  vehicle speed	Blockheater ECT @ start minus ECT @ condition: time after engine start	engine off time	management of the second second	IAT @ condition: vehicle speed for time	solar radiation case 2: IAT @ start	AAT @ condition: vehicle speed for time	<u>solar radiation case 1:</u> AAT @ start minus	ECT @ condition: time after engine start	Blockheater ECT @ start	engine off time	Secondary Farameters
15204520 [rpm] > 40 [°C]	active	> 5.0 [s] <= 2 [K] > 40 [km/h] > 5.0 [s]	<= 2 [K] > 40 [km/h]	< 2 [K]	> 6 [h]	and the second s	> 40 [km/h] > 5.0 [s]	<= 2 [K]	> 40 [km/h] > 5.0 [s]	<= 2 [K]	180.0 [s]	< 2 [K]	> 6 [h]	Enable Condition
multiple	1980 [ms]				0 [s] once / DCY								0 [s] once / DCY	Time Length
	2 DCY				2 DCY								2 DCY	WIL HIUM.

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Component / System Knock Sensor	Fault Code P0327	rt / System Fault Code Monitor Strategy Description  sor P0327 short to ground Port B	Malfunction Criteria lower threshold	Threshold Value < -0.70 [V]	Secondary Parameters engine speed	Enable Condition > 1000 [rpm]	Monitoring Time Length 0.5 [s] continuous	MIL Illum. 2 DCY
	P0327 P0332	short to ground Port A	lower threshold	<-0.70[V]	engine speed	> 1000 [rpm]	0.5 [s] continuous	
	P0328 P0333	short to battery plus Port B	upper threshold	> 1.00 [V]	engine speed	> 1000 [rpm]	0.5 [s] continuous	
	P0328 P0333	short to battery plus Port A	upper threshold	> 1.00[V]	engine speed	> 1000[rpm]	0.5 [s] continuous	
	P0327	signal range check	lower threshold	< 0.555.60 [V]	engine speed ECT	> 2000 [rpm] > 41 [°C]	2.0 [s] multiple	
	P0328	signal range check	upper threshold	> 16.5092.00 [V]	engine speed		2.0 [s]	
	P0333				ECT engine load	> 41 [°C] > 30.0037.50[%]		media.
Knock Control	P0324	internal hardware check	signal fault counter (combustion)	> 30.00[-]	engine speed	> 2000 [rpm]	0.5 [s] continuous	2 DCY
			signal fault counter (measuring window)	> 2.00 [-]				4
Throttle Position Sensor 1	P0122	out of range low	signal voltage	< 0.20 [V]			0.1 [s] multiple	2 DCY
	P0123	out of range high	signal voltage	> 4.81 [V]				2 DCY
	P0121	rationality check	TPS1-TPS2  and  actual TPS1-calc.value	> 5.16.3 [%] >  actual TPS2- calc.value	engine speed	> 480 [rpm]	0.3 [s] 2 DCY multiple	
			TPS1 - calc.value	> 9.00 [%]				
Throttle Position Sensor 2	P0222	out of range low	signal voltage	< 0.20 [V]			0.1 [s] 2 DCY	
	P0223	out of range high	signal voltage	> 4.81 [V]			0.1 [s] multiple	
	P0221	rationality check	TPS1-TPS2	> 5.16.3[%]	engine speed	> 480 [rpm]	0.3 [s] multiple	
			and  actual TPS2-calc.value	>  actual TPS1- calc.value				
			TPS2 - calc.value	> 9.00 [%]				$\vdash$

OBD Summary Table MY 11
Issue Date 03-09-2010 Engine Code CBTA
OBD-Group BVW-15 Test-Group BVWXV02.5U35 Revision Date
Test-Code Machine Graden Deposit

Component / System	Fault Code	OBD-Group BVVV-15 Test-Group BVVVXVVZ.5U35 Revision Date  If System Fault Code   Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Fnable Condition	Monitoring	MII Illum
							5	
Throttle Actuator	P2106	short to battery plus/ short to ground internal check	internal check	failed			0.5 [s] multiple	2 DCY
	P2106	open circuit	internal check	failed	duty cycle	> 80 [%]		2 DCY
					or deviation throttle value angles vs. calculated value	> 4.0050.00 [%]		
	P2106	temperatur / current monitoring	internal check	failed			0.5 [s] multiple	2 DCY
	P2106	functional check	internal check	failed				2 DCY
	P2101	signal range check	duty cycle	> 80 [%]				2 DCY
			<b>and</b> ECM power stage	no failure			1	
	P2101	rationality check	deviation throttle value angles vs. calculated value	> 4.0050.00 [%]			0.5 [s] multiple	2 DCY
Illionie Acmator Basic Settiligs	0000	landially check close Hoverheit	. O close to releter to bottle	, c.o.[s]	erigine speed	0 0	multiple	, ,
			and reference point	2.88 [%]	vehicle speed ECT IAT	0 km/h  > -20[°C] > -20[°C]		
					Case 1:	on		
					engine shut-off-time number of checks	4 [s] 2.00 [-]		
	P0638	signal range check @ mechanical stop low	TPS 1 signal voltage	NOT (0.400.80)[V]	engine speed	0 [rpm]	0.3 [s] multiple	2 DCY
			TPS 2 signal voltage	NOT (4.204.60)[V]	Case 1:	5 (7)		
			TPS1 + TPS2	NOT (4.825.18)[V]	ECT IAT	-20115 [°C] -20143 [°C]		
					Case 2: engine shut-off-time ECT IAT	5115 [°C]		
Accelerator Position Sensor 1	P2122	out of range low	signal voltage	< 0.61 [V]			0.50 [s]	2 DCY
	P2123	out of range high	signal voltage	> 4.79 [V]				2 DCY
	-		and the second s	A CONTRACTOR OF THE PROPERTY O				
Accelerator Position Sensor 2	P2127	out of range low	signal voltage	< 0.27 [V]			0.5 [s] continuous	2 DCY
	P2128	out of range high	signal voltage	> 2.43[V]				2 DCY

OBD Summary Table MY 11
Issue Date 03-09-2010 Engine Code CBTA
OBD-Group BVW-15 Test-Group BVWXV02.5U35 Revision Date
Part / System
IEsult Code | Monitor Strategy Descri

OBD-Group BVVV-10 Les	t-Group BVVVX	OBD-Group BVVV-10   est-Group BVVVXVUZ.0030 Revision Date						
Component / System	Fault Code	Monitor Strategy Description	Maltunction Criteria	Inresnoid Value	Secondary Parameters	Enable Condition	Time Length	MilL Illum.
Accelerator Position Sensor 1	P2138	rationality check	signal voltage sensor 1 vs. 2	>  0.170.70 [V]	signal voltage sensor 1	> 445.00 [mV]	0.24 [s]	2 DCY
aliu r					signal voltage sensor 2	> 445.00 [mV]	Commingous	
Idle Controller	P0506	out of range low	engine speed deviation	> 100 [rpm]	time after engine start	> 0.0 [s]	7.0 [s]	2 DCY
			and RPM controller torque value	>= calculated max.	engine speed vehicle speed	idle 0 [km/h]		
				Value	altitude ECT IAT	< 2700 [m] > -48 [°C] > -48 [°C]		
					vehicle speed external torque request	ready not demanded		
					engine load	for manual transmission: < 34 50 [%]		
	P0507	out of range high	engine speed deviation	< -100 [rpm]	time after engine start	> 0.0 [s]	7.0 [s]	2 DCY
			and RPM controller torque value	<= calculated min.	engine speed vehicle speed	idle 0 [km/h]	, and a second	
				\$ 2 0 0	altitude	< 2700 [m]		
					IAT	> 48 [°C]		
					vehicle speed external torque request	ready not demanded		
Injection Valves	P0201	lopen circuit	signal voltage	d.505.50[V]	liniection valve	switched off	0.50 [s]	2 DCY
	P0202				engine speed	> 80 [rpm]	continuous	
	P0204 P0205 P0203				,			
	P0261	short to ground	signal voltage	< 3.00 [V]	injection valve	switched off		2 DCY
	P0264 P0270 P0273				engine speed	> 80 [rpm]		
	P0267							
	P0262	short to battery plus	signal current	2.204.00 [A]	injection valve	switched on	0.50 [s]	2 DCY
	P0265 P0271				engine speed	> 80 [rpm]	COLUMN	
	P0274 P0268							

OBD Summary Table MY 11
Issue Date 03-09-2010 Engine Code CBTA
OBD-Group BVWX-15 Test-Group BVWXV02.5U35 Revision Date

0	continuous			ialion	CIGON	LL YOM GIGGS	0000	TO NO.
a DCV				6.104			Incene	EOM. EEDDOM
2 DCY	0.5 [s] continuous			failure	overvoltage detection	function monitoring: WDA	P0606	
2 DCY	0.5 [s] continuous			failure	internal check	function monitoring: WDA	P0606	
2 DCY	0.5 [s] continuous			failure	general cause		P0606	ECM: WDA
	continuous						P2304 P2310 P2313 P2307	
2 DCY	2.0 [s]	> 680 [rpm]	engine speed	> 5.17.0 [N]	signal voltage	short to battery plus	P2301	
							P2303 P2309 P2312 P2316	
2 DCY	2.0 [s]	> 680 [rpm]	engine speed	> 24.0 [mA]	signal current	short to ground	P2300	
				failed	<b>or</b> internal check		P0352 P0354 P0355 P0353	
2 DCY	2.0 [s] continuous	> 680 [rpm]	engine speed	0.252.0 [mA]	signal current	open circuit	P0351	Ignition Coils
2 DCY	2.0 [s] continuous			> 140[[°C]	ECT outlet	short to ground	P2184	
2 DCY	2.0 [s] continuous			<-40[°C]	ECT outlet	short to battery / open circuit	re P2185	Fan Control Coolant Temperature Sensor
2 DCY	6.00 [s] once / DCY	active active	key-on during ECM after-run time CAN	> 12.0 [s]	difference between engine-off-time and ECM after-run time	comparison of engine off time from instrument cluster control unit with engine after run time	P150A	
	ζ	active	CAN		and ECM after-run time			•
2 DCY	6.00 [s]	active	key-on after ECM after-run time	<-12.0[s]	difference between engine-off-time	comparison of engine off time from	P150A	Engine-Off-Time
		> 80 [rpm]	engine speed					
2 DCY	0.50 [s] continuous	commanded on	pump relay	0.601.20 [A]	signal current	short to battery plus	P0629	
2 DCY	continuous	commanded off	pump relay engine speed	^ 3.00 [V]	signal voltage	short to ground	P0627	
	0	> 80 [rpm]	engine speed					
2 DCY	0.50 [s]	commanded off	pump relay	4.505.50 [V]	signal voltage	open circuit	P0627	Fuel Pump Relay
MIL Illum.	Monitoring Time Length	Enable Condition	Secondary Parameters E	Threshold Value	Malfunction Criteria	Monitor Strategy Description	Fault Code	Component / System

OBD Summary Table MY 11
Issue Date 03-09-2010 Engine Code CBTA
OBD-Group BVW-I5 Test-Group BVWXV02.5U35 Revision Date

ECM: EGAS module		ECM: EGAS module	ECM: EGAS module		ECM: EGAS module		ECM: EGAS module	ECM: EGAS module	ECM: EGAS module	ECM: EGAS module		ECM: 5V Supply Voltage		ECM: Sensor	ECM: Sensor	ECM: Sensor	ECM: Self Ch	Component / System
nodule		nodule	nodule		nodule		nodule	nodule	nodule	nodule		oly Voltage		ECM: Sensor Reference Circuit C	ECM: Sensor Reference Circuit B	ECM: Sensor Reference Circuit A	ECM: Self Check for Sensor IC	bystem
P0606		P0169	P0169	P0606	P0606	A Commence of the Commence of	P0606	P0606	P0606	P0606		P0606	Same and the second	P0697	P0651	P0641	P0606	Fault Code
function monitoring: accelerator position		function monitoring: lambda mode	function monitoring: injection time	function monitoring: injection rate limitation	function monitoring: intern		function monitoring: ignition timing	function monitoring: engine speed devation	function monitoring: torque	function monitoring: A/D converter	and the second of the second o	internal hardware check	CONTRACTOR SOURCE STATE OF THE	signal range check	signal range check	signal range check	internal hardware check (electrical adjustment communication, voltage supply)	Monitor Strategy Description
internal check		internal check	comparison with fuel quantity	system reaction	system reaction	the Colombia of the South Sout	internal check	difference between calculated and internal engine speed	comparison with allowed engine torque	test voltage / test pulse check		under-/ overvoltage detection		signal voltage deviation	signal voltage deviation	signal voltage deviation	check	Malfunction Criteria
failed		failed	incorrect	incorrect	incorrect		failed	> 320 [rpm]	incorrect	failed				> +/- 0.3[V]	> +/- 0.3 [V]	> +/- 0.3[V]	failed	Threshold Value
		internal engine speed	internal engine speed					internal engine speed	internal engine speed		The state of the s		A Company of the state of the s					Secondary Parameters
		> 1200 [rpm]	> 1200 [rpm]					> 520 [rpm]	> 600 [rpm]		The second secon							Enable Condition
0.5 [s] continuous		n] 0.5 [s]	n] 0.5 [s] continuous	0.5 [s] continuous	0.5 [s] continuous		0.5 [s] continuous	n] 0.5 [s] continuous	n] 0.5 [s] continuous	0.5 [s] continuous		2.0 [s] continuous	Commence of the second second	0.5 [s] continuous	0.5 [s] continuous	0.5 [s] continuous	0.50 [s] continuous	Monitoring Time Lengt
snor		suor	snor	snor	snor	A. Chinasaaaaa	snor	snons	snor	snor		suor		snor	snor	 uous	SD	5
2 DCY	The state of the s	2 DCY	2 DCY	2 DCY	2 DCY		2 DCY	2 DCY	2 DCY	2 DCY		2 DCY	The second of the second	2 DCY	2 DCY	2 DCY	2 DCY	MIL Illum.

OBD Summary Table MY 11
Issue Date 03-09-2010 Engine Code CBTA
OBD-Group BVWA-15 Test-Group BVWXX/02.5U35 Revision Date

	-							
Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
ECM: EGAS module	P0169	function monitoring: mixture control	correction factor	incorrect	internal engine speed	> 1200 [rpm]	0.5 [s] continuous	2 DCY
	P0169	function monitoring: mixture control	fuel quantity	incorrect			0.5 [s] continuous	2 DCY
		Secretaristic Control of the Control			and and the second an			
ECM: EGAS module	P0606	monitoring modul	function controller check and	failed	SPI-interface	no failure	0.5 [s] continuous	2 DCY
			monitoring module check	no failure				
ECM: EGAS module	P0169	function monitoring: load plausibility	abs. difference between predicted	> 11.30[%]	engine speed	>= 1200[rpm]	0.5 [s] continuous	2 DCY
						anner of the Congress of the conservation of t		
CAN: Vehicle Speed Sensor	U0415	CAN communication with Vehicle speed Sensor	speed sensor signal: initialisation error	327.08 [km/h]	/h] time after ignition on	500 [ms]	1980 [ms] continuous	2 DCY
	U0415	CAN communication with Vehicle Speed Sensor	speed sensor signal: low voltage error	327.25 [km/h]	/h] time after ignition on	500 [ms]	1980 [ms] continuous	2 DCY
	U0415	CAN communication with Vehicle Speed Sensor	speed sensor signal: sensor error	327.42 [km/	/h] time after ignition on	500 [ms]	480 [ms] continuous	2 DCY
	U0415	CAN communication with Vehicle Speed Sensor	vehicle speed	>= 325 [km/h]	/h] time after ignition on	500 [ms]		2 DCY
	U0415	CAN communication with Vehicle Speed Sensor	speed sensor signal: out of range	326.39 [km/h]	/h] time after ignition on	500 [ms]	480 [ms] continuous	2 DCY
CAN: Internal Fault	P0606	CAN controller RAM check	RAM error	memory checksum error	initialization phase		none [-] once / DCY	2 DCY
And the second s		announced to the second of	and the second s		Commence of the second	and the second s	A commence of	Concession of the
CAN: CAN-Bus A	U0001	reading back sent message	CAN message	no feedback	time after ignition on	500 [ms]	250 [ms] continuous	2 DCY
	U0002	CAN communication check	global time out	receiving no message	time after ignition on	500 [ms]	450 [ms] continuous	2 DCY
CAN: TCM	U0101	CAN communication with TCM	received CAN message	no message	time after ignition on	500 [ms]	500 [ms] continuous	2 DCY
	U0402	CAN communication with TCM	received data	implausible message	time after ignition on	500 [ms]	60 [ms] continuous	2 DCY

OBD Summary Table MY 11
Issue Date 03-09-2010 Engine Code CBTA
OBD-Group BVW-I5 Test-Group BVWXV02.5U35 Revision Date

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
CAN: TCM	U0302	CAN communication with TCM	recieved AT vehicle data	TCM signal	time after ignition on	500 [ms]	5000 [ms]	2 DCY
			day Bay John of May John John and and and					Marine S. S. S. S. A. S. Sansanas
CAN: Instrument Cluster	U0155	CAN communication with Instument received CAN message	eceived CAN message	no message	time after ignition on	500 [ms]	2000 [ms]	2 DCY
		Cluster Modul					continuous	
	U0423	CAN communication with Instument   received data	eceived data	implausible message	time after ignition on	500 [ms]	3000 [ms]	2 DCY
		Cluster Modul					continuous	
				and a second as second as second as second as	anna an an Air Air an Airmean ann an ann an ann an an ann an ann a			The same of the sa
CAN: Ambient Air Temperature Sensor	U0423	communication with Instument (Cluster Modul	ambient temperatur value (initialization)	[-]   H00	key on		3.0 [s] continuous	2 DCY
					status ambient temperatur from	no fault		
					instrument cluster			
					electrical check ambient	no fault		
					temperature sensor			
CAN: Gateway	U0146	CAN communication with Gateway	received CAN message	no message	time after ignition on	500 [ms]	500 [ms]	2 DCY
							continuous	
CAN: Brake Unit	U0121	CAN communication with Brake Unit received CAN message	eceived CAN message	no message	time after ignition on	500 [ms]	500 [ms]	2 DCY
							continuous	
	U0415	CAN communication with Brake Unit received data	eceived data	implausible message	time after ignition on	500 [ms]	400 [ms]	2 DCY

From: "Hart, Robert (VWoA)"

Sent: Mon 3/15/2010 6:21:07 PM

Subject: RE: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to

Verify

mailto:Snyder.Jim@epamail.epa.gov

Hello Jim,

I just checked and I have the notification.

Thanks,

**Bob Hart** 

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, March 15, 2010 1:59 PM

To: Hart, Robert (VWoA)

Subject: RE: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Bob, I waived the Bugatti request this morning. Did you receive an email notification of it from Verify?

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From:

"Hart, Robert (VWoA)" < Robert. Hart@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

03/15/2010 07:50 AM

Subject:

RE: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Hello Jim,

According to Germany, the 1200 hp engine has a modification to the catalyst coating but the precious metal loading stays at the same level. Bugatti uses EPA assigned DF's so it would still be covered within the same durability group statistic.

Let me know if you have any other questions.

Best regards,

**Bob Hart** 

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, March 10, 2010 4:30 PM

To: Hart, Robert (VWoA)

Subject: Re: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Yes, I see it. I'm backed up today but I'd like to call and ask a few questions about it tomorrow.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Hart, Robert (VWoA)" < Robert. Hart@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

03/10/2010 11:37 AM

Subject:

VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Hello Jim.

This is just a "heads-up" for the running change test waiver request that I just submitted to Verify. Bugatti is bumping up the engine output to 1200 h.p..

Best regards,

**Bob Hart** 

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Phone: (248) 754-4224 Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: Robert Peavyhouse/AA/USEPA/US@EPA[]

Cc: Jim Snyder/AA/USEPA/US@EPA[]

From: "Thomas, Richard"

**Sent:** Tue 3/16/2010 11:47:49 AM

Subject: 2009 Volkswagen Group Final LDT CAFE

2009 CAFE LDT VWX VER01.txt

Hello Bob;

Thanks for returning my phone call yesterday. Please find the 2009 Volkswagen Group LDT Final CAFE CFEIS file as you suggested we start the 2009 model year EPA CAFE calculation process. I understand this will be the last year where we continue using the old CFEIS system for this submission. Would you return the calculation to me via an email or through the Verify mail system?

Best regards, Richard E. Thomas VOLKSWAGEN GROUP OF AMERICA, INC. 3800 Hamlin Road Auburn Hills, MI48326 Engineering and Environmental Office (EEO) Phone: 248 754-4213

Fax: 248 754-4207 Richard.Thomas@VW.com

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F2 01 S6 4 2 N N 3 C N
F2 02 S6 F 2 N N 3 C N
F2 03 M6 F 2 N N N N N
FR 01 O 3.949 2.303 1.556 1.164 0.860 0.688
FR 02 O 3.949 2.303 1.556 1.164 0.860 0.688
FR 03 O 3.923 2.158 1.895 1.379 1.091 0.917
FL 01 L 0 0 760 760 760 0
FL 01 H 0 0 3100 2300 1675 0
FL 02 L 0 0 760 760 760 0
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                9008456 01
FT 002 01
          Η
                9008416 01
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To: From:	Jim Snvder/AA/USEPA/US@EPA[]  Ex. 7
Sent: Subject:	Wed 3/17/2010 1:48:31 AM RE: VW/AUDI Meeting March 18, 2010
Hi Jim:	
I will bring	g a projector.
Thanks,	
Ex. 7	
Sent: Tue	rder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov] sday, March 16, 2010 3:43 PM x. 7   e: VW/AUDI Meeting March 18, 2010
Thanks,	forwarded it so we can look at it beforehand.
Do you ha	eve a projector or do I need to reserve one?
Jim Snyde	r / Vehicle Group
Complian	ce and Innovative Strategies Division
(734) 214	
snyder.jin	n@epa.gov
From:	Ex. 7
To:	LA. 1
	im Snyder/AA/USEPA/US@EPA
Cc:	
	<b>Ex.</b> 7

Date:

03/16/2010 10:22 AM

Subject:

VW/AUDI Meeting March 18, 2010

#### Hello Jim:

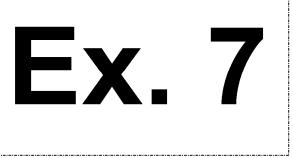
In preparation for our meeting on March 18, 2010, I am providing, as a refresher, the report from our last meeting on January 27, 2010, including the presentation material.

Also attached is the new presentation material.

Please treat all materials as CONFIDENTIAL.

See you on Thursday.

Best regards,



Volkswagen Group of America, Inc.

**Ex.** 7

[attachment "Microsoft PowerPoint - EPA\_agenda\_presentation\_Jan\_2010\_part1.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "Microsoft PowerPoint - EPA\_agenda\_presentation\_Jan\_2010\_part2.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "Meeting Report\_JAN\_27\_2010.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "00\_Agenda\_EPA\_Cert.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "01\_ HEV\_EPA\_Cert\_f.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "02\_ EPA\_operation\_mode.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "03\_EPA\_EV\_FCEV.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "04\_ HEV\_EPA\_Cert\_f.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "05\_EPA\_test\_matrix\_types.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "06\_EPA\_Coldstart\_valve.pdf" deleted by Jim Snyder/AA/USEPA/US]

To: Jim Snyder/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris

Nevers/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Chris

Nevers/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA[]

From: Ex. 7

**Sent:** Mon 3/22/2010 7:17:16 PM

Subject: Test Report

Hello Jim, Steve and Chris:

As a follow-up to our meeting last week, one of my colleagues in Germany has asked if EPA could possibly "...share a SOC test protocol and the +/- 1% criteria calculation...". Normally, the reference to protocol means report.

They would be interested in seeing what data are recorded and the data content of the calculation. If necessary, any vehicle- or manufacturer-specific information could be lined out.

Best regards,



Volkswagen Group of America, Inc.



Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]

**From:** "Thomas, Suanne" **Sent:** Fri 3/26/2010 1:11:59 PM

Subject: VW: AECD Submission V6 diesel 3.0L Test Group follow-up

AECD MY11 V6TDI EPA DPF.pdf SCR driver message system MY11.pdf AECD Table B3 V6TDI update03h.pdf

suanne.thomas@vw.com

Hi Jim:

This note is to follow-up on our phone conversation on 18Feb regarding the V6 diesel AECD documentation. Please see the attached files and let me know if you would like to discuss in more detail.

During our call, my understanding was that you would like to see the system description for SCR strategy when the urea is low. And also a description of the regeneration of the particulate trap. The PM-Trap-Strategies are active under all normal driving conditions and don't change due to specific trigger signals. Same for the SCR-Warning-System.

Also included is table "B3" with the list of sensors and actuators with default mode/consequence. For clarification, here is additional definition of terms used in these documents: "Reduced EGR" means in most of the cases "EGR shut off" --> See Table B3; "Limited Torque" means reduced fuel (nothing else); "Limp Home" means further reduction of fuel mass compared to "Limited Torque" (--> Extremely Limited Torque). SCR is not affected by "Limp Home".

Any comments are welcome.

Best regards, Suanne

From: Thomas, Suanne

Sent: Tuesday, February 16, 2010 1:05 PM

To: 'snyder.jim@epa.gov'

Subject: RE: VW: AECD Submission V6 diesel 3.0L Test Group

Hi Jim: just checking if you have any comments/feedback for us.

Take care, Suanne

From: Thomas, Suanne

Sent: Monday, February 01, 2010 2:11 PM

To: 'snyder.jim@epa.gov' Subject: VW: AECD Submission V6 diesel 3.0L Test Group
Dear Jim:
Attached is the information we just discussed regarding the AECD information for our V6 diesel.
We have used a new format for the information with the intent to make it more clear how the strategies work to assist in your review.
Please let me know if you would like an overview of the information via conference call. We are happy to do that, just let me know what time would be convenient for you.
Note: a timeslot in the morning would be preferable for us.
Sincerely,
Suanne Thomas
Engineering and Environmental Office

Auburn Hills, MI 48326 Phone: (248) 754-4206 Cell: (248) 797-4074 FAX: (248) 754-4207

3800 Hamlin Road

E-Mail: suanne.thomas@vw.com

Volkswagen Group of America, Inc.

From: "Hart, Robert (VWoA)"  Sent: Tue 4/6/2010 2:38:00 PM  Subject: VW Group: New Test Waiver Requests Submitted - MY 2011 Audi
Hello Jim,
I just submitted two new test waiver requests (1 EDV and 1 FEDV) for Audi test group BADXV04.23UH. The EDV was tested for exhaust and Evap.
I believe I included enough information in the request for you to make a decision.
Best regards,
Bob
Robert Hart
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
Phone: (248) 754-4224
Fax: (248) 754-4207
E-mail: robert.hart@vw.com

To:

Jim Snyder/AA/USEPA/US@EPA[]

**From:** "Hart, Robert (VWoA)" **Sent:** Tue 4/6/2010 3:15:08 PM

Subject: RE: Lamborghini

Hello Jim,

There is only the one transmission. It has a button to select a manual mode which allows you to use the paddles on the steering wheel to shift but there are no plans for a manual transmission with a clutch pedal. The transmission reverts back to automatic if the paddles are not used after a period of time.

We perform the tests to allow us to check both methods of FE calculation. Then we use whichever is better. We substitute the SCO3 and Cold CO tests from the appropriate worst case (manual or automatic trans.) for the calculations.

Best regards,

**Bob Hart** 

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, April 05, 2010 1:07 PM

To: Hart, Robert (VWoA) Subject: Lamborghini

Bob, I have a couple more questions on the Lamborghini.

- Is there still a manual trans version to be submitted or just an automatic?
- -The FEDV shows a City, HWFE and US06. Why the US06, are you using 5 cycle testing or Derived? If you are using are you going with 5 cycle FE, are you proposing to use SC03 / Cold CO data from the EDV?

Thanks.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Tue 4/13/2010 1:58:55 PM Test Process Question
Hello Jim,	
	's been a while since Audi has had confirmatory tests that include an Evap test, they would like ne order of testing.
As we und	erstand it, the process is as follows:
FTP	
2-Day Evap	o test
No fuel cha	ange.
LA4 (as pre	ep for US06)
US06	
HWFET (as	prep for HWFET)
HWFET	
is this corr	ectr
Best regard	ds,
Bob	
Robert Hai	rt
Engineerin	g and Environmental Office

1

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

From: "Hart, Robert (VWoA)"

Sent: Wed 4/14/2010 12:09:39 PM

Subject: RE: VW Group: Bugatti Carline

Hi Jim,

The A8 and A8L are different carlines.

**Bob Hart** 

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, April 13, 2010 5:21 PM

To: Hart, Robert (VWoA)

Subject: Re: VW Group: Bugatti Carline

Yes, after reading and discussing with Tom and Dave, I am convinced the Veyron GT is not a different car line.

I'm still looking into it for other instances. Say, if the Audi A8L had a different FE label, I think it would need to be listed separately from the A8.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

04/12/2010 11:11 AM

Subject:

VW Group: Bugatti Carline

Hello Jim,

I need to finish this running change fairly soon. Have you come to any conclusion on our Bugatti carline discussion yet?

Best regards,

**Bob Hart** 

Robert Hart

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Phone: (248) 754-4224 Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Thur 4/15/2010 11:27:38 AM Question Answered -FW: Test Process Question
Hello Jim,	
I called Ber	n Haynes and got the answer to the question below.
Best regard	ds,
Bob Hart	
Sent: Tueso To: 'Snydeo	, Robert (VWoA) day, April 13, 2010 9:59 AM r.Jim@epamail.epa.gov' est Process Question
Hello Jim,	
	s been a while since Audi has had confirmatory tests that include an Evap test, they would like e order of testing.
As we undo	erstand it, the process is as follows:
FTP	
2-Day Evap	test
No fuel cha	ange.
LA4 (as pre	pp for US06)
US06	

HWFET (as prep for HWFET)
HWFET
Is this correct?
Best regards,
Bob
Robert Hart
ROBERTIAL
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
Phone: (248) 754-4224
Fax: (248) 754-4207
E-mail: robert.hart@vw.com

To: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Thur 4/15/2010 6:26:41 PM		
Subject:	Supplemental Information Submitted for BADXT03.03UG		
Hello Jim,			
Vehicle ID:	B3UG-TAQ cfg. 0 Test Group: BADXT03.03UG		
This is just tests.	a heads-up for the supplemental information submission for the Audi Q7 diesel confirmatory		
The inform	nation has been successfully submitted.		
Best regard	ds,		
Bob Hart			
Robert Har	rt		
Engineering and Environmental Office			
Volkswage	n Group of America, Inc.		
3800 Hamlin Road			
Auburn Hil	ls, MI 48326		
Dh /0.4	0) 754 4004		
	8) 754-4224		
Fax: (248) 754-4207			
E-mail: robert.hart@vw.com			

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Mon 4/19/2010 6:53:51 PM Test Waiver Request Submitted Under New Test Group		
Hello Jim,			
Touareg un	ed the test waiver request for test vehicle EDV B3UG-TAQ cfg 1 as cfg 2 for the LTD3 diesel der the new test group BADXT03.02UG. This is the diesel we spoke about last week. You told g. 0 has been selected for confirmatory testing. This vehicle as cfg. 1 was waived.		
Cfg. 1 and 2 are identical, except that cfg. 2 is now an EDV. I may not have needed to create cfg. 2 but there is no way to delete a configuration once it is created.			
	If this new test group to separate the LTD3 vehicle from the LTD4 test group because, as I the LDT4 SFTP tests did not meet LDT3 SFTP standards.		
Call me if you have any questions.			
Best regards,			
Bob Hart			
Robert Hart			
Engineerin	g and Environmental Office		
Volkswage	n Group of America, Inc.		
3800 Hamlin Road			
Auburn Hills, MI 48326			

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]

**From:** "Thomas, Suanne" **Sent:** Fri 4/23/2010 9:37:17 PM

Subject: RE: AECD Submission V6 diesel 3.0L Test Group follow-up

suanne.thomas@vw.com

Hi Jim: This is just to follow-up my phone message today, I would like confirm that our discussions on the AECDs for this concept for MY2011 are completed. Of course we are open to provide additional information to you however I would like to be sure that we are ready to process our MY2011 certification paperwork.

Thank you for your time spent in your review and we are willing to continue to improve the information format for future model year submissions. Any suggestions are welcome.

Take care, Suanne

From: Thomas, Suanne

Sent: Friday, March 26, 2010 9:12 AM

To: 'snyder.jim@epa.gov' Cc: Hart, Robert (VWoA)

Subject: VW: AECD Submission V6 diesel 3.0L Test Group follow-up

Hi Jim:

This note is to follow-up on our phone conversation on 18Feb regarding the V6 diesel AECD documentation. Please see the attached files and let me know if you would like to discuss in more detail.

During our call, my understanding was that you would like to see the system description for SCR strategy when the urea is low. And also a description of the regeneration of the particulate trap. The PM-Trap-Strategies are active under all normal driving conditions and don't change due to specific trigger signals. Same for the SCR-Warning-System.

Also included is table "B3" with the list of sensors and actuators with default mode/consequence. For clarification, here is additional definition of terms used in these documents: "Reduced EGR" means in most of the cases "EGR shut off" --> See Table B3; "Limited Torque" means reduced fuel (nothing else); "Limp Home" means further reduction of fuel mass compared to "Limited Torque" (--> Extremely Limited Torque). SCR is not affected by "Limp Home".

Any comments are welcome.
Best regards, Suanne
From: Thomas, Suanne Sent: Tuesday, February 16, 2010 1:05 PM To: 'snyder.jim@epa.gov' Subject: RE: VW: AECD Submission V6 diesel 3.0L Test Group
Hi Jim: just checking if you have any comments/feedback for us.
Take care, Suanne
From: Thomas, Suanne Sent: Monday, February 01, 2010 2:11 PM To: 'snyder.jim@epa.gov' Subject: VW: AECD Submission V6 diesel 3.0L Test Group
Dear Jim:
Attached is the information we just discussed regarding the AECD information for our V6 diesel.
We have used a new format for the information with the intent to make it more clear how the strategies work to assist in your review.
Please let me know if you would like an overview of the information via conference call. We are happy to do that, just let me know what time would be convenient for you.
Note: a timeslot in the morning would be preferable for us.
Sincerely,
Suanne Thomas
Engineering and Environmental Office
Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Phone: (248) 754-4206 Cell: (248) 797-4074 FAX: (248) 754-4207

E-Mail: suanne.thomas@vw.com

To:	Willem VandenBroek/A	A/USEPA/US@E	EPA[]	
Cc:	Jim Snyder/AA/USEPA	/US@EPA	Ex. 7	
	Ex. 7			
From:	Ex. 7			
Sent:	Mon 4/26/2010 1:43:02	PM		
Subject:	2011 EPA Certification	Fees		
2011 EPA	Cert Fees Bugatti.pdf			
Audi six T	Gs 2011 to Aiax pdf			

Hello Bill;

I thought it would better enable you to keep track of the Volkswagen Group (Volkswagen, Audi, Bentley, Lamborghini, Bugatti) certification fees paid, since our payments are made electronically and the fee filing forms are mailed to St. Louis.

I am attaching the first 2011 Volkswagen Group Certification Fee filing form for the Bugatti test group. This fee was paid or transferred to the EPA account last Friday, April 23rd. This fee filing form was mailed to St. Louis on the same day.

Additionally, six Audi test group fee filing forms are attached in a single pdf file for which the payment will be made this Friday, April 30th. I will mail these fee filing forms to St. Louis today.

If you rather not be notified with these email notices, or have a comment please feel free to contact me directly.

Best regards,

VOLKSWAGEN GROUP OF AMERICA, INC.

<b>⊗EPA</b>	MOTOR VEHICLE AND ENGINE COMPLIAN  ON-HIGHWAY FEE FILING FOR FOR CERTIFICATION APPLICATIONS RECEIVED IN	RM
Manufacturer	Name VOLKSWAGEN GROUP OF America, Inc.	With the state of
Address	2000 Hamlin Dood	
	Zip Code/Country Auburn Hills, MI 48326	
X LDV/LD	On-Highway Certification Request Type	
	T/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,591)	
	Engine Dyno cert) FEDERAL (\$35,967)	MOTORCYCLE (\$1,210)
	mgine byno cerc, rebekki (433,907)	
I .	engine family or test group or ve family name:	B G T V 0 8 . 0 V 1 6
Amount paid (	U.S. Funds Only):	\$ 34,849.00
Enter the chec	eck number, or the statement "EFT/WIRE" or "EFT/ACH"	
	ail sales price of the vehicles/engines: \$an Independent Commercial Importer: List the VI	
Company Repres	esentative: RICHARD E. THOMAS Signat	ure:
	n Cert Strategist Phone/Fax: 248 754 4213 / 24	Li
E-mail Address: Richard.Thomas@VW.com  Submission of payments and forms:  (1) Online: Forms may be found and submitted with or without payments online at <a href="www.Pay.gov">www.Pay.gov</a> .  (2) Send checks and this form to:		
Environmental Protection Agency Motor Vehicle and Engine Compliance Program P.O. Box 979032 St. Louis, MO 63197-9000		
(3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2) (4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2) (5) Forms not submitted under (1) and (2) above can be sent as email attachments to Fees@epa.gov. Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).		
The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.		
	· ————————————————————————————————————	This form expires: 1/1/2011

&EPA .	MOTOR VEHICLE AND ENGINE COM ON-HIGHWAY FEE FILIN	IG FORM
_	FOR CERTIFICATION APPLICATIONS RECEIVE	ED IN CALENDAR YEAR 2010
	VOLKSWAGEN GROUP of AMERICA, Inc. 3800 HAMLIN ROAD	
Address		
City/State/Zip	Code/Country AUBURN HILLS, MI 48326	
POT TANAMAN TA	On-Highway Certification Request	Type (check one)
⊠ LDV/LDT/N	MDFV/HDV (Chassis cert) FEDERAL (\$34,849)	☐ HDV EVAP-ONLY (\$511).
_ LDV/LDT/h	ADPV/HDV (Chassis cert) CAL-ONLY (\$17,591)	HDE CALIF-ONLY (\$511)
☐ HDE (Engi	ine Dyno cert) FEDERAL (\$35,967)	☐ MOTORCYCLE (\$1,210)
		LD/MDPV/HDV ICI (\$47,928)
EPA standard end	gine family or test group or family name:	B A D X T 0 3 . 0 2 U G
Amount paid (U.S	S. Funds Only):	\$ 34,849.00
Enter the check	number, or the statement "EFT/WIRE" or "EFT	C/ACH": EFT/ACH
	sales price of the vehicles/engines: \$	the VIN of imported vehicles/engines below:
	RICHARD E THOMAS	<b>Ex.</b> 6
	cert Strategist Phone/Fax: 248 754 4213	
	D1.1. 171 NAA	/ 248 754 4207 Date: 4 /23 / 2010
(1) Online: Form	ayments and forms:  as may be found and submitted with or without and this form to:	out payments online at www.Pay.gov.
*	Environmental Protectio Motor Vehicle and Engine Comp P.O. Box 979032 St. Louis, MO 63197-	liance Program
<ul><li>(4) Transmit off</li><li>(5) Forms not so</li><li>Forms and payment</li></ul>	fline EFT/Wire payments to the New York Fed fline EFT/ACH payments to the Federal Reservable under (1) and (2) above can be sent its sent in ways other than the above may be sending checks and forms by private mail	nt as email attachments to Fees@epa.gov. be delayed or ineffective. See the
on EPA's need for this including through the u	and recordkeeping burden for this collection of information is est information, the accuracy of the provided burden estimate, and use of automated collection techniques, to the Director, Collection Ivania Ave., N.W., Washington, D.C. 20460. Include the OM 29 to this address.	any suggested methods for minimizing respondent burden, Strategies Division, U.S. Environmental Protection Agency
The state of the s		This form expires: 1/1/2011

<b>⊗</b> EPA		GINE COMPLIANCE PROGRAM "EE FILING FORM	
	FOR CERTIFICATION APPLICATIONS	March and the state of the stat	AR 2010
Manufacturer	Name VOLKSWAGEN GROUP of AMER	ICA, Inc.	
Address	3800 HAMLIN ROAD		
City/State/Zi	ip Code/Country AUBURN HILLS,	MI 48326	
	On-Highway Certificatio	n Request Type (check one)	
X LDV/LDT	/MDFV/HDV (Chassis cert) FEDERAL (\$	34,849)	ONLY (\$511)
_ LDV/LDT	/MDPV/HDV (Chassis cert) CAL-ONLY (	\$17,591)	'-ONLY (\$511)
☐ HDE (En	gine Dyno cert) FEDERAL (\$35,967)	☐ MOTORCYCL	E (\$1,210)
		☐ TD/WDBA/H	DV ICI (\$47,928)
EPA standard e	ngine family or test group or e family name:	B A D X T	0 3 . 0 3 U G
Amount paid (U	.S. Funds Only):		\$ 34,849.00
Enter the chec	k number, or the statement "EFT/WIR	E" or "EFT/ACH":	EFT/ACH
Aggregate reta	lculation (minimum initial payment il sales price of the vehicles/engin Independent Commercial Importer:	nes: \$ x 1	% = \$
Company Repres	entative: RICHARD E. THOMAS	Signature: la Man	of from
	Cert Strategist Phone/Fax: 248 754		Date: 4 /23 / 2010
E-mail Address Submission of (1) Online: Fo	01-1		
Environmental Protection Agency Motor Vehicle and Engine Compliance Program P.O. Box 979032 St. Louis, MO 63197-9000			
(3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2) (4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2) (5) Forms not submitted under (1) and (2) above can be sent as email attachments to Fees@epa.gov. Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).			
The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.			
L		This form expi	res: 1/1/2011

SEPA MOTOR VERTICAL AND ENGINE ON-HIGHWAY FEE F	COMPLIANCE PROGRAM	
FOR CERTIFICATION APPLICATIONS REC		
Manufacturer Name VOLKSWAGEN GROUP of AMERICA, I	nc.	
Address 3800 HAMLIN ROAD		
City/State/Zip Code/Country AUBURN HILLS, MI 48	326	
On-Highway Certification Req	uest Type (check one)	
☑ LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$34,84)	9)	
LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,5	91)	
☐ HDE (Engine Dyno cert) FEDERAL (\$35,967)	☐ MOTORCYCLE (\$1,210)	
EPA standard engine family or test group or HDV Evaporative family name:	B A D X V 0 4 . 2 3 U H	
Amount paid (U.S. Funds Only):	\$ 34,849.00	
Enter the check number, or the statement "EFT/WIRE" or	"EFT/ACH": EFT/ACH	
Reduced fee calculation (minimum initial payment \$750) Aggregate retail sales price of the vehicles/engines: Check box if an Independent Commercial Importer:  Li	\$ x 1% = \$	
DICUADO E TUOMAS	VI KHI	
Company Representative: RICHARD E. THOMAS	• '	
Title: Emission Cert Strategist Phone/Fax: 248 754 4213	/ 248 754 4207 Date: 4 /23 / 2010	
E-mail Address: Richard.Thomas@ VW.com  Submission of payments and forms:  (1) Online: Forms may be found and submitted with or v  (2) Send checks and this form to:	without payments online at www.Pay.gov.	
Environmental Prote Motor Vehicle and Engine P.O. Box 97 St. Louis, MO 63	Compliance Program 19032	
(3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2) (4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2) (5) Forms not submitted under (1) and (2) above can be sent as email attachments to Fees@epa.gov. Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).		
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	This form expires: 1/1/2011	

U.S. ENVIRONMENTAL PROTECTION AGENCY MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM SEPA ON-HIGHWAY FEE FILING FORM FOR CERTIFICATION APPLICATIONS RECEIVED IN CALENDAR YEAR 2010 Manufacturer Name VOLKSWAGEN GROUP of AMERICA, Inc. 3800 HAMLIN ROAD Address \_\_\_ AUBURN HILLS, MI 48326 City/State/Zip Code/Country On-Highway Certification Request Type (check one) □ LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$34,849) HDV EVAP-ONLY (\$511) LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,591) ☐ HDE CALIF-ONLY (\$511) HDE (Engine Dyno cert) FEDERAL (\$35,967) MOTORCYCLE (\$1,210) ☐ LD/MDPV/HDV ICI (\$47,928) EPA standard engine family or test group or 5 D 2 3 8 HDV Evaporative family name: Amount paid (U.S. Funds Only): 34,849.00 EFT/ACH Enter the check number, or the statement "EFT/WIRE" or "EFT/ACH": Reduced Fee Section (40 CFR \$1027.120) Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/engines covered: Aggregate retail sales price of the vehicles/engines: \$\_\_\_ x 1% = \$ Check box if an Independent Commercial Importer: [ ] List the VIN of imported vehicles/engines below: Company Representative: RICHARD E. THOMAS Signature:\_/ , 248 754 4207 <sup>6</sup> Title: Emission Cert Strategist Phone/Fax: 248 754 4213 Date: 4 /23 / 2010 Richard.Thomas@ VW.com E-mail Address: Submission of payments and forms: (1) Online: Forms may be found and submitted with or without payments online at www.Pay.gov. (2) Send checks and this form to: Environmental Protection Agency Motor Vehicle and Engine Compliance Program P.O. Box 979032 St. Louis, MO 63197-9000 (3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2) (4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2) (5) Forms not submitted under (1) and (2) above can be sent as email attachments to Fees@epa.gov. Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express). The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response, Send comments

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# U.S. ENVIRONMENTAL PROTECTION AGENCY MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM

ON-HIGHWAY FEE FILING FORM  FOR CERTIFICATION APPLICATIONS RECEIVED IN CALENDAR YEAR 2010
Manufacturer Name VOLKSWAGEN GROUP of AMERICA, Inc.
Address 3800 HAMLIN ROAD
City/State/Zip Code/Country AUBURN HILLS, MI 48326
On-Highway Certification Request Type (check one)
▼ LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$34,849)
LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,591) HDE CALIF-ONLY (\$511)
HDE (Engine Dyno cert) FEDERAL (\$35,967)
☐ LD/MDPV/HDV ICI (\$47,928)
EPA standard engine family or test group or HDV Evaporative family name:
Amount paid (U.S. Funds Only): \$ 34,849.00
Enter the check number, or the statement "EFT/WIRE" or "EFT/ACH":
Reduced Fee Section (40 CFR §1027.120)  Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/engines covered:  Aggregate retail sales price of the vehicles/engines: \$ x 1% = \$  Check box if an Independent Commercial Importer:   List the VIN of imported vehicles/engines below:
Company Representative: RICHARD E. THOMAS Signature: Richard Municipal Signature: Richard Management (1988)
Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 26 / 2010
E-mail Address: Richard.Thomas@ VW.com  Submission of payments and forms:  (1) Online: Forms may be found and submitted with or without payments online at <a href="www.Pay.gov">www.Pay.gov</a> .  (2) Send checks and this form to:
Environmental Protection Agency Motor Vehicle and Engine Compliance Program P.O. Box 979032 St. Louis, MO 63197-9000
(3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2) (4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2) (5) Forms not submitted under (1) and (2) above can be sent as email attachments to Fees@epa.gov. Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).
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This form expires: 1/1/2011

# U.S. ENVIRONMENTAL PROTECTION AGENCY MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM

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LD/MDPV/HDV	V ICI (\$47,928)
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Reduced fee calculation (minimum initial payment \$750): Total number of vehicl Aggregate retail sales price of the vehicles/engines: \$ x 1% Check box if an Independent Commercial Importer: [] List the VIN of imported v	= \$
Company Representative: RICHARD E. THOMAS Signature: Land	15 Alman
Company Representative: RICHARD E. THOMAS Signature: Little: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207	Date: 4 /26 / 2010
E-mail Address: Richard.Thomas@ VW.com Submission of payments and forms: (1) Online: Forms may be found and submitted with or without payments online at (2) Send checks and this form to:	General Control C
Environmental Protection Agency Motor Vehicle and Engine Compliance Program P.O. Box 979032 St. Louis, MO 63197-9000	
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This form expires	: 1/1/2011

#### Page 2

#### Instructions

NOTE: This form applies to complete certification applications that are received in Calendar Year (CY) 2010. Fee amounts due are subject to change every year. Use of the form for the wrong calendar year can cause incorrect payments and delays. Get the form for the calendar year of your application submission at

www.epa.gov/otaq/fees.htm or www.Pay.gov. Forms and payments may be submitted online at www.Pay.gov.

### **Manufacturer** Name and Address

List the applicant's corporate name and corporate address as it will appear on the Certificate of Conformity.

### **Certification Request Type**

Check the box that specifies the certification request type. If you are paying a reduced fee, still mark the appropriate certification request type.

## EPA Standard Engine Family or Test Group or HDV Evaporative Family Name

Enter the appropriate EPA standardized engine family or test group name as it will appear on the Certificate of Conformity. Forms and payments for Modification and Test vehicles under 40 CFR 85.1509 must list the engine family for the currently valid Certificate of Conformity under which the vehicles are being imported.

## **Amount Paid**

Enter the appropriate fee amount for the designated certification request type. The full fee, payable in U.S. dollars, along with a properly completed fee filing form, must be received before certification review can begin. All banking fees are the responsibility of the manufacturer. The reduced fee amount (if applicable) is also entered in this box.

# Check Number, EFT/ACH, or EFT/WIRE (for offline payments)

The check number is mandatory for check, money order, bank draft, or certified check; or enter the letters "EFT/WIRE" or "EFT/ACH" if sending an electronic funds transfer. Indicate the standard engine family or test group name on the check. Make checks payable to "U.S. Environmental Protection Agency". Indicate in the EFT message field the information:

<u>For Wire</u>: RDFI: Federal Reserve Bank; Location Code (Same as EPA Account Number): <u>68-01-0099</u>; <u>"EPA MVECP Fee"</u>; <u>ABA number</u>: <u>021030004</u>. (ABA number is same as Swift Code or Routing Number for participating banks. For further information, email Fees@epa.gov). Note: the wire detail corresponding to ABA 021030004 is "TREAS NYC"; this is the same as the Federal Reserve Bank.

<u>For ACH</u>: RDFI: Federal Reserve Bank, Routing Transit number: 051036706, Account number: 540006, Account Name: U.S. Environmental Protection Agency (EPA). Note: the 051036706 company name appears as "U.S. EPA"; the receiving bank is still the Federal Reserve Bank of Cleveland.

Please include in wire or ACH message fields the following: the words "MVECP Fees", manufacturer name, and engine family/test group/HDV evaporative group name(s). If space is limited, list one name and the number of families.

### Reduced Fee Section (if applicable)

Reduced fee submissions must be supported by the reduced fee calculation on Page 1 of this form and any relevant supporting information requested by EPA at the time of application review. Enter the number of vehicles/engines projected for sale under the engine family/test group. Enter the aggregate projected retail sales price of the vehicles or engines and multiply that value by 1% (.01). Enter and pay the reduce fee amount (minimum \$750). If you are an ICI, please enter the VIN for any vehicles/engines already (or soon to be) in your possession. For any additional VINs, please use a separate page. For further information see the reduced fee provisions under 40 CFR §1027.120.

#### **Company Representative**

Enter the representative's name, signature, title, phone/fax, date, and an e-mail address. Note: an acknowledgment of fees received will be sent to this e-mail address. No other receipts will be sent.

# Bank Address for Private Mail Shipment (other than U.S. Postal Service)

If using a private shipping service such as Federal Express (or other service), send checks with fee filing forms to:

U.S. Bank Government Lockbox 979032 1005 Convention Plaza SL-MO-C2-GL St. Louis, MO 63101 To: David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]

Cc: Ex. 7

Sent: Wed 4/28/2010 1:16:42 PM

Subject: 2009 Volkswagen Group NOx Fleet Average Final Report

Hello Dave;

As we discussed today on the phone, I wanted to bring to your attention that the three HLDT test groups as listed on the "Current MY Credit Calculation" tab, do not appear in the summary section at the bottom of the page.

The attached file will be submitted to the agency via Verify later today. If you have any questions, please contact me directly.

Best regards,
Ex. 7
VOLKSWAGEN GROUP OF AMERICA, INC.
<b>- -</b>
<b>LV</b>

CBI 9VWX COMMON CR1 ABT R00.XLS

To: Jim Snyder/AA/USEPA/US@EPA[]
Cc: Linc Wehrly/AA/USEPA/US@EPA[]

From:

Ex. 7

**Sent:** Thur 5/6/2010 9:04:53 PM

Subject: Volkswagen 2.0L TDI AECD Description

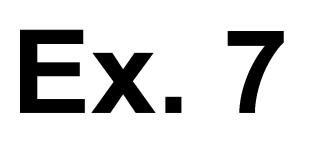
Ex. 7

Hello Jim:

Please find a copy of the 2011 MY Volkswagen 2.0L TDI AECD description for your review/approval in the EPA VERIFY system. There is a second document in the form of a stand-alone request for approval of the "Ki-Factors," (that is, the upward- and downward-adjustment factors for the regeneration of the DPF and the NOx adsorber). This is the document referred to as Attachment No.2 in the Table of Contents for the AECD description.

If there are any questions, please let me know.

Best regards,



Volkswagen Group of America, Inc.



Sent: Tue 5/11/2010 6:53:18 PM Subject: VW Group: Test Waiver Requests Submitted
Hello Jim,
This is just a "heads up" for the two test waiver requests I submitted.
The Jetta gets a new body for MY 2011. This is a new test group for MY 2011 (BVWXV02.0MPI). It is an updated reincarnation of the naturally aspirated 2.0l engine that was discontinued for the U.S. after MY 2006. It uses MPI fuel injection similar to the current 2.5l 5 cylinder engine. It comes equipped with either an automatic 6 speed or a manual 5 speed transmission. The Jetta is the only model planned for this test group in MY 2011. We will also be submitting 2.5l, 5 cyl. versions very soon.
Let me know if you need any more information.
Best regards,
Bob Hart
Robert Hart
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
Phone: (248) 754-4224

Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)"

To: From:

1

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William"

Sent: Fri 5/14/2010 3:35:03 PM

Subject: VW Test Waiver Requests

william.rodgers@vw.com

Hello Jim,

As a heads up, I have submitted 12 VW test waiver requests this morning representing two carryover 2.5L test groups. Each includes all new tests as the result of a newly designed replacement for Jetta Sedan models and revised manual transmission gearing.

Let me know if you have any questions.

Thanks,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

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Christoph	Jim Snyder/AA/USEPA/US@EPA[] David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;"Kohnen, (VWGoA)" [christoph.kohnen@ww.com]; inc Wehrly/AA/USEPA/US@EPA;"Kohnen, (VWGoA)" [christoph.kohnen@vw.com]; Kohnen, Christoph (VWGoA)" .kohnen@vw.com] "Kata, Leonard" Fri 11/19/2010 9:47:21 PM 2012 Volkswagen Pre-Certification Document and Meeting Request
ousjoot.	2012 Volkowagon 110 Cortinoation Boodment and Mooting Request
Hello Jim:	
with the ex	ve have completed preparation of the 2012 Volkswagen pre-certification letter, in accordance kisting "Dear Manufacturer" guidance letter on this topic (CCD-03-12). Our letter will be filed ERIFY system today.
	er we state that we will follow with our 2012 Pre-Model Year GHG Report. We are finishing this and intend to submit the report to the VERIFY system in the very near future.
certificatio	ate that we would like to schedule a meeting. At the meeting we would walk through the pre- in letter and attachments and present to 2012 pre-model year GHG report. As mentioned the s will be available for your prior review.
	hanksgiving Holiday next week, staff schedules are somewhat mixed, as might also be the case erefore, I would like to propose a meeting with EPA on Wednesday, December 1, 2010.
Please let r	me know if this date is acceptable.
Best regard	ds,
Len	
Leonard W	/. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]

From: "Kata, Leonard"

**Sent:** Tue 11/30/2010 5:54:15 PM

Subject: Accepted: VW Pre-Cert mtg and 2012 pre-model year GHG report

To: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]
Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]
From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

**Sent:** Fri 12/3/2010 11:47:58 AM **Subject:** VW526710023 11-30-10 VW526710023 11-30-10.pdf

Good morning Bob,

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact Jim Snyder or me.

Thanks for your patience Bob,

Vince Mazaitis



			£ 11 / pr					C 2/C
		Final Labor		L Laboratory			2	cvs
			ratory Test Res 2010-0330-00	sults- Refer to VE	KIFY Reports		\#ME90740000	
Test Information			11/30/2010	U .	·		VW526710023	
		Start / Hot Soak:		30			VOLKSWAGEN	
UNITED STATES	•			99		MFR Codes:		VWX
( C 3)	r	uel Container ID:		Transfer and		Config #:		
			61 Tier 2 Cert			Transmission:		
( 7 / S)	·			el 2-day Exhaust (0	-	Shift Schedule:		
The most of		culation Method:	Gasoline		8	Beginning Odometer:	004303.0 MI	
CHOC	F	Pretest Remarks:				Drive Schedule:		
		**************************************	Marshine			Soak Period:	24.0 hours	
N N-4-								
Bag Data		HC-FID	<u>CO</u>	NOx	<u>CO2</u>	CH4	NonMeth HC	
Phase 1		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample		10.182	30.307	2.367	1.240	2.510		
Ambieni		2.703	0.955	0.014	0.044	1.931		
Net Concentration	1	7.730	29.440	2.355	1.200	0.759	6.911	
								*
	Remarks:	:						
Phase 2		•						
Sample	:	3.350	0.690	0.191	0.573	1,849		
Ambient		2.542	0.000	0.008	0.043	1.918		
Net Concentration		0.917	0.690	0.183	0.531	0.014	0.902	
	,	0.017	0.000	0.100	0.551	0.014	0.902	
	Remarks:							
Phase 3								
Sample		3.306	6.238	0.497	0.865	1.924		
Ambient		2.451	0.000	0.010	0.043	1,912		
Net Concentration		1.013	6.238	0.488	0.825	0.136	0.866	
	5							
Thomas d	Remarks:							
Phase 4		0.007	0.005					
Sample		2.867	0.605	0.334	0.488	1.871		
Ambient		2.733	0.000	0.010	0.043	1.920		
Net Concentration		0.234	0.605	0.325	0.447	0.021	0.211	
	Remarks	This test has par	ticulate results					
Results		HC-FID	<u>co</u>	NOx	CO2	CH4	NMHC / NMOG	Vol MPG
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
	Phase 1	0.098	0.757	0.091	485.1	0.011	0.088 / 0.092	18.272
	Phase 2	0.019	0.028	0.011	343.4	0.000	0.018 / 0.019	25.880
	Phase 3	0.013	0.161	0.019	334.8	0.002	0.011 / 0.012	26.535
	Phase 4	0.005	0.025	0.020	288.5	0.000	0.004 / 0.004	30.809
		•					(NMOG=1.04xNMHC)	
	Weighted	0.02957	0.21518	0.03237	354.278		0.0267 / 0.0278	
uel Economy		Gasoline MPG	·····			Dyno Settings		D329 - AWD
	Phase 1	18.25					Inertia:	
	Phase 2	25.85					EPA Set Co A:	
	Phase 3	26.51					EPA Set Co B:	
			49/ COO Limit	Act SOC A-hr	Sys Nom Vo	Its Charge State	EPA Set Co C:	
	Phase 4	30.78	170 SUC LIIIII	701 000 A-111				······································
		30.78	1% SOC Limit 0.6890	-0.4973				
		30.78 25.06			288.0	Pass	Emiss-Bench:	

\* 1. 1 - 3 - 18

#### **PARTICULATE NVFEL Laboratory Test Data** Final Laboratory Test Results- Refer to VERIFY Reports for Official Data Test Number: 2010-0330-008 Vehicle ID: VW526710023 Test Date: 11/30/2010 MFR Name VOLKSWAGEN **Test Information** MITED STATES Key Start: 13:48:11 / 09:39 MFR Codes: 590 **VWX** Fuel Container ID: F00023 Config #: 00 Transmission: AUTO Fuel Type: 61 Tier 2 Cert Test Fuel Test Procedure: 21.04 Fed Fuel 2-day Exhaust (CAN LOAD) Shift Schedule: A09980005 Beginning Odometer: 004303.0 MI Calculation Method: Gasoline Drive Schedule: ftp4bag Pretest Remarks: Soak Period: 24.0 hours All filter weights are corrected for buoyancy. **Total Mass** Net Wt Total Mass Particulate 4 8 1 **Filter** <u>Filter</u> <u>Tare</u> **Gross** Filter Sampler (Pre Wt) (Post Wt) mg/mi comment No. mg mg 7067560 140,9967 0.03697 23.162 6.461 Phase 1 A 141.0337 В 7067561 140.3475 140.3871 0.03957 24.804 6.919 С 26.163 7067562 0.04158 7.298 142,2697 142.3113 Remarks: 7067563 141.6238 141.6521 0.02826 17.656 4.597 Phase 2 Α 7067564 141.7567 141.7878 0.03117 19.467 5.069 В C 145.6394 145.6702 0.03078 19.242 5.010 7067565 Remarks: Phase 3 Α 7067566 142.8943 142.9275 0.03317 20.766 5.788 В 7067567 147.2771 147.3015 0.02437 15,294 4.263 C 7067568 149,0163 149.0414 0.02508 15.683 4.371 Remarks: 7067569 149.6534 149.6858 0.03239 20.214 5.260 Phase 4 Α 5.416 В 7067570 146.9659 146.9992 0.03328 20.814 С 142,9747 142.9995 0.02476 15.600 4.060 7067571 Remarks: This test has particulate results. Average Results Net Wt **Total Mass** Total Mass mg/mi mg mg 0.03937 Phase 1 24.710 6.893 Phase 2 0.03007 18.789 4.892 0.02754 17.248 4.807 Phase 3 0.03014 18.876 4.912 Phase 4 All filter weights are corrected for buoyancy. Weighted All Filters: 5.28987 Stability Check Dyno #: D329 - AWD Reference Filter Stability Check <u>Tare</u> Gross Net Wt 2% of Avg Net or 0.01 mg No. (Pre Wt) (Post Wt) PASS/FAIL Inertia: 5500 mg **PASS** 0.00525 EPA Set Co A: -5.22 0.01 1 145.74284 145.74809 146.49367 146.49852 0.00485 PASS EPA Set Co B: -0.1555 2 EPA Set Co C: 0.02786 Emissions Bencl Mexa 7200dle v101007 - d329 EPAVDAEm101130125340 Page 1 of 2 Print Time 02-Dec-2010 12:23

6.0		****	NVFE	Laboratory Te	st Data		PARTICULA
(8 T)		Test Number: 2	ory Test Res	ults- Refer to VERIF	Y Reports for		
VEIGHING	CHAMBER	Buoyancy	Operator	Chamber Temp			VW526710023
	Timestamp	Factor	(id)		Dew Point	<u>Barometer</u>	Last Change in Status
re-test	11/30/10 10:20	1.0011021	021798	(°F)	(°F)	("Hg)	Status @ timestamp
ost-test	12/1/10 10:43	1.0011044	022298	71.2	48.4	28.74	NORM @ 11/30/10 08:32:31
	12, 11, 10, 10, 10	1.0011044	022290	71.5	49.2	28.82	NORM @ 11/30/10 20:30:17
est Cond	tions		Phase 1	Phase 2	Phase 3		
	Ba	arometer (inHg)	28.68	28.68	28.69	Phase 4	
		ell Temp (degF)	74,47	75.02	75.13	28.69	
	De	w Point (degF)	49.06	49.10	49.17	74.66	•
	Specific Humid	lity (grains/lbm)	53.94	54.02		49.14	
		Ox Corr Factor	0.9099	0.9102	54.16	54.07	
	• •	Dilution Factor	10.77		0.9108	0.9104	
	CFV W	mix (scf @68F)	2783.34	23.37	15.47	27.43	
	Sample Volum	A A (set @BBE)	4,464	4769.22	2797.15	4768.51	
	Sample Volume	e R (sci @00F)		7.671	4.490	7.677	
	Sample Volume	o D (sci @cor)	4.462	7.672	4.479	7.662	
	Sample Volume	o D (act @cor)	4.445	7.665	4.494	7.606	
Sam	iple Volume Avera	2 D (SCI @68F)					
Van	Total V	ige (sci @b8F)	4.457	7.669	4.488	7.648	
	10(a) Vi	nix (scf @68F)	2796.71	4792.23	2810.61	4791.455301	
		ase Time (sec)	506.90	869.60	509.70	869.59	
	υ	istance (miles)	3.585	3.841	3.588	3.843	
	PSU P	robe A (degC)					
	PSU P	robe B (degC)					
	PSU P	robe C (degC)					
	PSU D	il Air A (degC)	41.4	41.1	41.3	44.0	
	PSU D	il Alr B (degC)	43.7	43.3		41.3	
	PSUD	il Air C (degC)	40.2	40.0	43.3	43.3	
	PSILI	Filter A (degC)	45.5		40.1	40.1	
	PSILI	Filter B (degC)	47.0	47.5	45.6	45.5	
		Filter C (degC)		46.1	45.6	47.4	
	1001	il Flow A (ipm)	44.2	44.0	44.3	44.9	
	F3U DI	il Flow B (Ipili)	29.9	30.0	29.9	30.0	
	PQU D	Flow B (Ipm)	29.9	30.0	29.9	30.0	
	POU DI	I Flow C (ipm)	30.0	30.0	29.9	30.0	
	PSUAI	Proportionality					
	POUR	Proportionality					
	P30 G1	Proportionality					
007 - d329_	EPAVDAEm10113	0125340		Page 2 of 2	***************************************		Print Time 02-Dec-2010 12

			NVFEL	Laboratory T	est Data			CVS
		Final Laborat	ory Test Resu	lts- Refer to VER	IFY Reports for	Official Data		
esults	-1X(-1)	Test Number: 2				Vehicle ID	W526710023	
		HC-FID	CO	, NOx	CO2	<u>CH4</u>	NMHC	Meth Response
UNITED STATE	Phase	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	1.079
	Phase		2.715	0.325	1739.0	0.040	0.316	
1	Phase		0.109	0.043	1319.1	0.001	0.071	
	S Phase		0.578	0.068	1201.1	0.007	0.040	
PROTECT	Phase	4 0.018	0.096	0.077	1108.7	0.002	0.017	
(4)						<b>V</b>		
st Conditio	<u>ns</u>	P9 4 55 54 5	Phase 1	Phase 2	Phase 3	Phase 4		
		Barometer (inHg)	28.68	28.68	28.69	28.69		
	Avç	Cell Temp (degF)	74.47	75.02	75.13	74.66		
		Dew Point (degF)	49.06	49.10	49.17	49,14		
	Specific Hu	midity (grains/lbm)	53.94	54.02	54.16	54.07		
		NOx Corr Factor	0.9099	0.9102	0.9108	0.9104		
		O2 Dilution Factor	10.770	23.374	15,471	27.43		
		V Vmix (scf @68F)	2783.34	4769.22	2797.15	4768.51		
	Tot	al Vmix (scf@68F)	2796.71	4792.23	2810.61	4791.46		
	CVS Flo	w Rate Avg (scfm)	329.45	327.18	329.27	329.01		
		Fan Placement: O	ne Fan - Down	- Front				
	F	Phase Time (secs)	506.90	869.60	509.70	869.59		
		Distance (miles)	3.585	3.841	3.588	3.843		
	Bag An	alysis Time (secs)	954.0	148.8	961.3	0.040		
				·				
	-							
R Test Resu	ilts	for Procedure 21 Fe	ederal fuel 2-da	y exhaust (w/can	load)			
<u>v</u>	MFR Number	: <u>HC</u>	co	NOx	CO2	NMOG	NonMeth HC	ì

v101007 - d329\_

 $\hat{g} = \left(e^{-\frac{1}{2}-\epsilon} \cdot e^{-\frac{1}{2} \cdot \epsilon}\right)^{m}$ 

EPAVDAEm101130125340

<u>Odometer</u>

3993 M

MPG 27.2

MPG is 8.54 % higher than EPA MPG

Page 2 of 2

Print Time 02-Dec-2010 12:23

MFR Lab: Volkswagen AG, Dept EASZ/1

Fuel: 61 Tier 2 Cert Gasoline

Dyno: 21

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Kata, Leonard" Tue 12/14/2010 6:27:03 PM FW: Confernece Call - Audi
Hi Jim:	
the office	your message that the proposed time for tomorrow is not good. Unfortunately, Lothar is not in on Thursday or Friday, so my suggestion is to postpone until early next week. Would you time, preferably no later than 11:00 a.m. on Monday (12/20) or Tuesday (12/21) that would ou?
l will try to	get some materials to you prior to the call. To be more specific about the topics:
1. Gen	eral discussion concerning start-stop devices.
2. Shift	speeds for manual transmission vehicles with start-stop devices.
Thanks,	
Len	
To: 'Snyde	a, Leonard ay, December 10, 2010 7:57 AM r.Jim@epamail.epa.gov' onfernece Call - Audi
Hello Jim:	
	g about scheduling a conference call with you and EPA staff to Discuss start-stop devices with nar Rech from Audi would join.
Wednesda	ay, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.

Please let me know what you think.
Regards,
Len
Leonard W. Kata
Manager, Emission Regulations and Certification
Engineering and Environmental Office
Volkswagen Group of America, Inc.
Phone: (248) 754-4204
Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Kata, Leonard" Tue 12/14/2010 6:47:14 PM RE: FW: Confernece Call - Audi
Hi Jim:	
l just wrote	e back and tried to recall the message. I read your message too fast.
Next Mond	lay at 10:00 sounds good. I will let Lothar know.
Best regard	ds,
Len	
Leonard W	. Kata
Manager, E	Emission Regulations and Certification
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
Phone: (24	8) 754-4204
Cell: (248)	797-3886
E-Mail: leo	nard.kata@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, December 14, 2010 1:35 PM

To: Kata, Leonard

Subject: Re: FW: Confernece Call - Audi

Next Tuesday is mtg from 9 to 10 again so I guess monday morning. How about 10:00?

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

С.	~	n	٠.
	ı		ŧ.

"Kata, Leonard" <Leonard.Kata@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

12/14/2010 01:27 PM

Subject:

FW: Confernece Call - Audi

Hi Jim:

I received your message that the proposed time for tomorrow is not good. Unfortunately, Lothar is not in the office on Thursday or Friday, so my suggestion is to postpone until early next week. Would you propose a time, preferably no later than 11:00 a.m. on Monday (12/20) or Tuesday (12/21) that would work for you?

I will try to get some materials to you prior to the call. To be more specific about the topics:

- 1. General discussion concerning start-stop devices.
- 2. Shift speeds for manual transmission vehicles with start-stop devices.

Thanks,

Len

From: Kata, Leonard

Sent: Friday, December 10, 2010 7:57 AM To: 'Snyder.Jim@epamail.epa.gov' Subject: Confernece Call - Audi

Hello Jim:

I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi. Lothar Rech from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.

Please let me know what you think.

Regards,

Len

\_\_\_\_\_

Leonard W. Kata Manager, Emission Regulations and Certification Engineering and Environmental Office Volkswagen Group of America, Inc.

Phone: (248) 754-4204 Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[] From: "Hart, Robert (VWoA)" Sent: Tue 12/14/2010 7:40:35 PM Subject: Certificate for MY 2012 Test Group CVWXV02.5259			
Hello Jim,			
I received a message on Friday that the certificate for MY 2012 Test Group CVWXV02.5259 was waiting to be signed.			
Is there any reason it hasn't been signed yet?			
Best regards,			
Bob Hart			
Robert Hart			
Engineering and Environmental Office			
Volkswagen Group of America, Inc.			
3800 Hamlin Road			
Auburn Hills, MI 48326			
Phono: (249) 754 4224			
Phone: (248) 754-4224			
Fax: (248) 754-4207			
E-mail: robert.hart@vw.com			

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Kata, Leonard"

**Sent:** Wed 12/15/2010 4:02:51 PM

Subject: Accepted: Audi phone conference: Start/stop and manual trans

To: Cc: From:	Jim Snyder/AA/USEPA/US@EPA[] "Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE] "Kata, Leonard"  Wed 13/45/2010 4:07:17 PM
Sent: Subject:	Wed 12/15/2010 4:07:17 PM EPA/AUDI Conference Call
Hi Jim:	
conferenc	nlins must be active today. I sent an outlook invitation to you with a call-in number for our e call on Monday (12/20) at 10:00. I keep getting an "undeliverable" message back, but the enny sent items folder.
So just ir Code belo	a case, the following is the information for the call-in. Please use the Dial-In and the Participant w.
Audio Con	ference Information:
	Non-Responsive
	•
	<u>LJ</u>
Best regar	ds,
Len	
Leonard W	/. Kata
Manager,	Emission Regulations and Certification
Fngingarir	ng and Environmental Office

1

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: From: Sent: Subjec	Wed 12/15/2010 4:17:30 PM
Hello Ji	im,
	ubmitted two more MY 2012 test waiver requests. I expect to submit two more by the end of the possible.
	st four were for two FEDV's (automatic and manual transmission versions) for test group $\sqrt{02.5U35}$ – federal only BIN 5 new midsized sedan (NMS).
This is	a new model to be produced at VW's new factory in Tennessee.
The tw	o from today and the two yet to be submitted are a PZEV version of the same vehicle.
These a	are all fuel economy tests for the first two test group applications that I have already submitted for ation.
Best re	egards,
Bob Ha	art
Robert	Hart
Engine	ering and Environmental Office
Volksw	ragen Group of America, Inc.
3800 H	lamlin Road
Auburr	n Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: "Thomas, Richard" [Richard.Thomas@vw.com]
Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]
From: CN=Willem VandenBroek/OU=AA/O=USEPA/C=US

**Sent:** Thur 1/6/2011 2:29:59 PM

Subject: CVWXV02.03SA and CVWXV02.03PA

#### Richard,

You should have received an automated email a few days ago saying that EPA had received payment for the Subject families at \$33,974 each. When we received the forms we charged them against the ACH payment for \$69,992 received from VW on 12/17/2010. (The forms for the remainder of that payment were filed from Germany). All that appears to be in order.

However, we noticed that the applications for these two families were filed in Calendar Year 2010. The fee is determined by the calendar year of the application (as stated at the top of the form), which, for applications received in calendar 2010, is \$34,849. Consequently, these two families have been designated as Short, On Hold, until the \$875 each has been received, upon which they will be listed as paid and cleared for certification review.

Let me know if you have any questions.

Bill Vanden Broek 734-214-4468 To: richard.thomas@vw.com[]

Cc: christoph.kohnen@vw.com;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[];

N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Mon 1/24/2011 6:59:45 PM

Subject: 2011 FE Guide - data attached as sent to DOE for January 2011 web update - Please

review & correct any errors in EPA's Verify database

VW 2011FEGuide1-all rel-dates-w-sales-01-10-2011.xlsx

Audi 2011FEGuide1-all rel-dates-w-sales-01-10-2011.xlsx

Bentley 2011FEGuide1-all rel-dates-w-sales-01-10-2011.xlsx

Bugatti 2011FEGuide1-all rel-dates-w-sales-01-10-2011.xlsx

Lamborghini 2011FEGuide1-all rel-dates-w-sales-01-10-2011.xlsx

#### Richard,

Attached are Excel Spreadsheet(s) with the data that I sent to DOE on Jan 19, 2011 to update www.fueleconomy.gov (except that any model types highlighted in green filler were not sent to DOE). DOE anticipates updating the web the week of Jan 24th.

The attached spreadsheet(s) contain all the 2011 FE label data from EPA's Verify data base as of January 10, 2010. Please review the spreadsheet(s) and confirm for your records that the data are correct. Any corrections should be made directly in the EPA Verify database.

If there are any model types highlighted in green filler in the attached spreadsheet(s)---please correct the data in Verify and let me know that the corrections have been made (so I can forward the data to DOE for web posting).

As usual, please let me know if you find any other problems or errors in the data.

Thanks

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com] From: "Giles, Michael"
Sent: Mon 2/14/2011 9:07:59 PM Subject: Volkswagwen Application for Emissions Certification - Test group CVWXV06.3UA8
Hello Jim,
Just a heads up that we have submitted the application for the above listed test group. This is a new test group. Confirmatory tests were waived and no manufacturer retests were required.
Please let me know if you have any questions about this submission.
Regards
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Kata, Leonard" Thur 3/3/2011 3:47:17 PM VW Request for Approval - SCR and AECD		
Hello Jim:			
TDI Diesel.	ruary I submitted a document that describes the SCR system in the 2012 New Passat with 2.0L The document also contains information about AECDs for this engine concept. This is the midvehicle that will be produced beginning in late April in the new plant in Chattanooga, TN.		
I was wondering whether you have had a chance to look at the information and if you find it acceptable or have further questions or concerns.			
Please let r	me know.		
Best regard	ds,		
Len			
Leonard W	'. Kata		
Manager, I	Emission Regulations and Certification		
Engineerin	g and Environmental Office		
Volkswage	n Group of America, Inc.		
Phone: (24	8) 754-4204		
Cell: (248)	797-3886		
E-Mail: leo	nard.kata@vw.com		

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William"

**Sent:** Tue 3/8/2011 7:56:33 PM

Subject: VW Group Decision Information submissions for TG: CVWXV02.03PA

william.rodgers@vw.com

Hi Jim,

We submitted today two Decision Information data sets for test group CVWXV02.03PA. These are related to a forthcoming Running Change to add the Jetta model to this existing Bin 3/ SULEV (PZEV) test group.

No new technology is included with this model. The manual transmission configuration does require a HWY retest do to high fuel economy for the ETW.

Vehicle ID: VW361 00464 (Jetta manual trans)

VW465 00127 (Jetta automatic trans)

Best regards,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

To: @ford.com]; ill Pagels
[bill.pagels@meidenamerica.com]; ob Maxwell [remaxwell@comcast.net]; hris
Nevers/AA/USEPA/US@EPA[
@gm.com]; @na.mitsubishi-motors.com];
@na.mitsubishi-motors.com]; @anl.gov];
@chrysler.com]; im
Snyder/AA/USEPA/US@EPA;
[Keith.Thompson@bepco.com]; ent Theil [okt@chrysler.com]; kyle.bedsole@gm.com"
@gm.( @chrysler.com];
@tc.gc.ca]; @ganassi.com]; " @sae.org"
@sae.org'];@tc.gc.ca];N.)" [
['Paulina.Carl@epamail.epa.gov']; @ford.com] @yahoo.com]; Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com];
@ahm.honda.com" [
@nrd.nissan-usa.com];
Schrodt/AA/USEPA/US@EPA;"  @tema.toyota.com''
@tema.toyota.com"]; [ @tema.toyota.com"
@tema.toyota.com']; '  @ahm.honda.com'"
@ahm.honda.com'];
@tema.toyota.com
From: "Glodich, Jeffrey (J.M.)"
<b>Sent:</b> Fri 1/20/2012 6:35:58 PM
Subject: J2951 Phase II Review
<b>,</b>
Purpose:
- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication
Meeting Info:
Theoding mile.
Ex. 6
Web Address https://www.connectmeeting.att.com <a href="https://www.connectmeeting.att.com/">https://www.connectmeeting.att.com/</a>
Ex. 6

To: "Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; 'Bill Pagels'" [bill.pagels@meidenamerica.com]; 'Bob Maxwell'" [remaxwell@comcast.net]; hris Nevers/AA/USEPA/US@EPA;"Dave Kosmalski" [david.kosmalski@gm.com]; 'Dave [david.kosmalski@gm.com]; 'Dennis Pawlak'" [Dennis.Pawlak@na.mitsubishi-Kosmalski'" [Douglas.Reid@na.mitsubishi-motors.com]; 'Duoba, Mike'" motors.coml; 'Douglas Reid'" [mduoba@anl.gov]; 'Jeff Foor'" [jdf14@chrysler.com]; 'Jim Smith'" [james.smith@chrysler.com]; im Snyder/AA/USEPA/US@EPA;"'Keith Thompson'" [Keith.Thompson@bepco.com]; 'Keith Thompson'" [Keith.Thompson@bepco.com]; 'Kent Theil'" [okt@chrysler.com]; 'kyle.bedsole@gm.com'" [kyle.bedsole@gm.com]; 'Mahmoud Yassine'" [mky@chrysler.com]; 'Marc Belzile'" [marc.a.belzile@tc.gc.ca]; 'mark paxton'" [mpaxton@ganassi.com]; 'MBrussow@sae.org" ['MBrussow@sae.org']; 'Meyer, Norm'" [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.)" [okawa.n@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov'" ['Paulina.Carl@epamail.epa.gov']; Peabody, Jason (J.A.)" [jpeabod6@ford.com]; ete Janosi [petejanosi@yahoo.com]; Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com]; 'takashi a fujiwara@ahm.honda.com'" [takashi a fujiwara@ahm.honda.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; homas Schrodt/AA/USEPA/US@EPA;"'tom.beierschmitt@tema.toyota.com'" ['tom.beierschmitt@tema.toyota.com']; 'tom.beierschmitt@tema.toyota.com'"

['tom.beierschmitt@tema.toyota.com']; 'tom.beierschmitt@tema.toyota.com'" ['tom.beierschmitt@tema.toyota.com']; 'tommy\_chang@ahm.honda.com'" ['tommy\_chang@ahm.honda.com']; 'William Meschievitz'" [william.meschievitz@tema.toyota.com]; Khan, Farrukh" [KhanF@NRD.NISSAN-

USA.COM]

Cc: Carl Paulina/AA/USEPA/US@EPA[]

From: "Glodich, Jeffrey (J.M.)"
Sent: Thur 2/23/2012 5:18:39 PM

Subject: Rescheduled: J2951 Phase II Review (Mar 22 01:00 PM EDT in Toyota, Ann Arbor)

Rescheduled due to conflicts.

#### Purpose:

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

Meeting Info:

**Ex.** 6

Web Address https://www.connectmeeting.att.com/>

**Ex.** 6

To: "Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; 'Bill Pagels'" [bill.pagels@meidenamerica.com]; 'Bob Maxwell'" [remaxwell@comcast.net]; hris Nevers/AA/USEPA/US@EPA;"'Dave Kosmalski" [david.kosmalski@gm.com]; 'Dave [david.kosmalski@gm.com]; 'Dennis Pawlak'" Kosmalski'" [Dennis.Pawlak@na.mitsubishi-[Douglas.Reid@na.mitsubishi-motors.com]; 'Duoba, Mike'" motors.com]; 'Douglas Reid'" [mduoba@anl.gov]; 'Jeff Foor'" [jdf14@chrysler.com]; 'Jim Smith'" [james.smith@chrysler.com]; im Snyder/AA/USEPA/US@EPA;"'Keith Thompson'" [Keith.Thompson@bepco.com]; 'Keith Thompson'" [Keith.Thompson@bepco.com]; 'Kent Theil'" [okt@chrysler.com]; 'kyle.bedsole@gm.com'" [kyle.bedsole@gm.com]; 'Mahmoud Yassine'" [mky@chrysler.com]; 'Marc Belzile'" [marc.a.belzile@tc.gc.ca]; 'mark paxton'" [mpaxton@ganassi.com]; 'MBrussow@sae.org" ['MBrussow@sae.org']; 'Meyer, Norm'" [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.)" [okawa.n@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov" ['Paulina.Carl@epamail.epa.gov']; Peabody, Jason (J.A.)" [jpeabod6@ford.com]; ete Janosi [petejanosi@yahoo.com]; Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com]; 'takashi a fujiwara@ahm.honda.com'" [takashi a fujiwara@ahm.honda.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; homas Schrodt/AA/USEPA/US@EPA;"'tom.beierschmitt@tema.toyota.com'" ['tom.beierschmitt@tema.toyota.com']; 'tom.beierschmitt@tema.toyota.com'"

['tom.beierschmitt@tema.toyota.com']; 'tom.beierschmitt@tema.toyota.com'" ['tom.beierschmitt@tema.toyota.com']; 'tommy\_chang@ahm.honda.com'"

['tommy\_chang@ahm.honda.com']; 'William Meschievitz'"

[william.meschievitz@tema.toyota.com]; 'Khan, Farrukh'" [KhanF@NRD.NISSAN-

USA.COM]

**Cc:** Carl Paulina/AA/USEPA/US@EPA;Jeff Foor [j.foor@chrysler.com]; eff Foor

[j.foor@chrysler.com]; im Snyder/AA/USEPA/US@EPA[]

From: "Glodich, Jeffrey (J.M.)"

Sent: Wed 3/21/2012 11:51:34 AM

Subject: Cancelled: J2951 Phase II Review

Cancelled for this month only due to JSAE meeting.

Rescheduled due to conflicts.

### Purpose:

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

Meeting Info:

**Ex.** 6

Web Address https://www.connectmeeting.att.com/>

**Ex.** 6

From: "Rodgers, William"

**Sent:** Wed 4/4/2012 2:54:47 PM

Subject: Accepted: VW Group - Audi A8 w/Start/Stop and Cyl Deacitvation Test Drive

From: "Giles, Michael"

**Sent:** Wed 4/4/2012 4:49:02 PM

Subject: Tentative: VW Group - Audi A8 w/Start/Stop and Cyl Deacitvation Test Drive

Cc: "Giles, Michael" [michael.giles@vw.com]; Kata, Leonard"

[Leonard.Kata@vw.com] "Rodgers, William"

**From:** "Rodgers, William" **Sent:** Mon 4/16/2012 5:58:34 PM

Subject: VW Group - Request for AECD Approval

william.rodgers@vw.com

Hello Jim,

I have submitted to Verify two 2013 AECD approval requests for the following test groups. Please contact Len Kata or myself if you have any questions about these requests.

DVWXV02.0U5N - TDI (non-SCR)

DVWXV02.0U4S - TDI with SCR

Regards,

**Bill Rodgers** 

**Emissions Certification Engineer** 

VOLKSWAGEN Group of America, Inc. Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

**United States** 

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

To: "Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; 'Bill Pagels'" [bill.pagels@meidenamerica.com]; 'Bob Maxwell'" [remaxwell@comcast.net]; hris Nevers/AA/USEPA/US@EPA;"'Dave Kosmalski" [david.kosmalski@gm.com]; 'Dave [david.kosmalski@gm.com]; 'Dennis Pawlak'" Kosmalski'" [Dennis.Pawlak@na.mitsubishi-[Douglas.Reid@na.mitsubishi-motors.com]; 'Duoba, Mike'" motors.com]; 'Douglas Reid'" [mduoba@anl.gov]; 'Jeff Foor'" [jdf14@chrysler.com]; 'Jim Smith'" [james.smith@chrysler.com]; im Snyder/AA/USEPA/US@EPA;"'Keith Thompson'" [Keith.Thompson@bepco.com]; 'Keith Thompson'" [Keith.Thompson@bepco.com]; 'Kent Theil'" [okt@chrysler.com]; 'kyle.bedsole@gm.com'' [kyle.bedsole@gm.com]; 'Mahmoud Yassine'' [mky@chrysler.com]; 'Marc Belzile'" [marc.a.belzile@tc.gc.ca]; 'mark paxton'" [mpaxton@ganassi.com]; 'MBrussow@sae.org" ['MBrussow@sae.org']; 'Meyer, Norm'" [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.)" [okawa.n@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov'" ['Paulina.Carl@epamail.epa.gov']; Peabody, Jason (J.A.)" [jpeabod6@ford.com]; ete Janosi [petejanosi@yahoo.com]; Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com]; 'takashi a fujiwara@ahm.honda.com'" [takashi a fujiwara@ahm.honda.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; homas Schrodt/AA/USEPA/US@EPA;""tom.beierschmitt@tema.toyota.com'" ['tom.beierschmitt@tema.toyota.com']; 'tom.beierschmitt@tema.toyota.com'" ['tom.beierschmitt@tema.toyota.com']; 'tommy\_chang@ahm.honda.com'" ['tommy\_chang@ahm.honda.com']; 'William Meschievitz'" [william.meschievitz@tema.toyota.com]; 'Khan, Farrukh'"

USA.COM1

Carl Paulina/AA/USEPA/US@EPA[] Cc:

"Glodich, Jeffrey (J.M.)" From: Tue 4/17/2012 6:00:44 PM Sent:

Subject: Cancelled: J2951 Phase II Review

## Purpose:

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

Meeting Info:

**Ex.** 6

Web Address https://www.connectmeeting.att.com</https://www.connectmeeting.att.com/>

Ex. 6

[KhanF@NRD.NISSAN-

From: "Kata, Leonard"

**Sent:** Thur 4/19/2012 5:59:45 PM

Subject: Accepted: VW Group - Audi A8 w/Start/Stop and Cyl Deacitvation Test Drive

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Kata, Leonard" Fri 4/20/2012 1:22:03 PM Audi Start-Stop Demo
Hello Jim:	
Hope all is	well with you.
drive that v questions t	king with my Audi colleagues on Wednesday and they asked about the Audi start-stop demo we have scheduled with EPA for early May. They asked if EPA has any particular topics or that they should be prepared to address. My understanding was that EPA staff mainly wanted a drive the car. I suggested that they have a 2-3 slide overview just as a refresher.
Just so we	can be appropriately prepared, are you expecting any more detailed discussion?
Best regard	ds,
Len	
Leonard W	'. Kata
Manager, E	Emission Regulations and Certification
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
Phone: (24	8) 754-4204
Cell: (248)	797-3886
E-Mail: leo	nard.kata@vw.com

To: Cc:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com]
From: Sent:	"Giles, Michael" Mon 4/23/2012 7:37:38 PM
Subject:	VW Group - Decision Information Tiguan 4Motion
Halla lim	
Hello Jim,	
We have su	ubmitted vehicle information, test results and decision requests for the following:
MY 2013 I	est Group DVWXJ02.03UA
Vehicle ID	VW316 20145 (config. 0 & 1, see below)
Carline: Tig	guan 4Motion carline
Configurati	ion 0: (New worst case EDV) – with updated TCM software
Configurati	ion 1: (FEDV with low roll tires) – with updated TCM software
	ot yet submitted a RC letter but would appreciate if you could notify us with decision nat your earliest convenience.
Regards,	
Mike	
Michael Gi	les
Certificatio	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	ls, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Cc: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com] "Giles, Michael" Wed 5/2/2012 7:02:45 PM
Subject: Cabriolet	VW Group Certificate Request - Test Group DADXV04.23UL Audi RS5 / RS5
Hello Jim,	
	ubmitted the initial application and certificate request for Test Group DADXV04.23UL, e family DADXR0140B8A which is for the Audi RS5 / RS5 Cabriolet.
This is a ne	w test group with a new EDV and a carryover evaporative family.
Please prod	ceed with your review and let me know if you have any questions.
Regards,	
Mike	
Michael Gil	les
Certificatio	n Specialist
Engineering	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hill	ls, MI 48326
United Stat	res of America
Phone +1-2	.48-754-4229

FAX +1-248-754-4207

To: Cc: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com] "Giles, Michael" Wed 5/2/2012 7:11:33 PM
Subject: Cabriolet	RE: VW Group Certificate Request - Test Group DADXV04.23UL Audi RS5 / RS5
One detail highly app	I forgot to mention – the RS5 has short timing for us, so any priority you can give would be reciated.
Thanks,	
Mike	
	s, Michael nesday, May 02, 2012 3:03 PM yder (Snyder.Jim@epamail.epa.gov)
Cc: Rodge	· · · · · · · · · · · · · · · · · · ·
Hello Jim,	
	submitted the initial application and certificate request for Test Group DADXV04.23UL, re family DADXR0140B8A which is for the Audi RS5 / RS5 Cabriolet.
This is a ne	ew test group with a new EDV and a carryover evaporative family.
Please pro	ceed with your review and let me know if you have any questions.
Regards,	
Mike	
Michael G	on Specialist
oer ancati	on specialise

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

From: "Giles, Michael"

**Sent:** Wed 5/2/2012 8:25:56 PM

Subject: RE: VW Group Certificate Request - Test Group DADXV04.23UL Audi RS5 / RS5

Cabriolet

snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com Snyder.Jim@epamail.epa.gov

Hi Jim,

It should be there now – I submitted the request too soon after the application (VERIFY took longer to process the application so it rejected my first request).

Thanks

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, May 02, 2012 4:02 PM

To: Giles, Michael

Subject: RE: VW Group Certificate Request - Test Group DADXV04.23UL Audi RS5 / RS5 Cabriolet

I don't see it in Verify.
Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael" < michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William" < William.Rodgers@vw.com>

Date: 05/02/2012 03:12 PM

Subject: RE: VW Group Certificate Request - Test Group DADXV04.23UL Audi RS5 / RS5 Cabriolet

One detail I forgot to mention – the RS5 has short timing for us, so any priority you can give would be

highly appreciated.

Thanks, Mike

From: Giles, Michael

Sent: Wednesday, May 02, 2012 3:03 PM To: Jim Snyder (Snyder.Jim@epamail.epa.gov)

Cc: Rodgers, William

Subject: VW Group Certificate Request - Test Group DADXV04.23UL Audi RS5 / RS5 Cabriolet

Hello Jim,

Today we submitted the initial application and certificate request for Test Group DADXV04.23UL, evaporative family DADXR0140B8A which is for the Audi RS5 / RS5 Cabriolet.

This is a new test group with a new EDV and a carryover evaporative family.

Please proceed with your review and let me know if you have any questions.

Regards,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA;"Nagel, Carsten (N/EA-521)"

[Carsten.Nagel@audi.de]; Nagel, Carsten (N/EA-521)" [Carsten.Nagel@audi.de];

Kissling, Karlheinz (N/EA-521)" [Karlheinz.Kissling@AUDI.DE]

From: "Kata, Leonard"

**Sent:** Mon 5/7/2012 12:42:01 PM **Subject:** Audi Start-Stop Meeting

When: Tuesday, May 08, 2012 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: EPA Conference Room

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*

Hello Jim:

Last week, I reported the names of the participants for the Audi Start-Stop system meeting and demo drive. Unfortunately, Mr. Kissling will not be attending in person. If possible, we would like to connect with some of our colleagues in Germany by telephone.

Therefore, I have arranged a conference call-in number. I would appreciate it if there is a speaker telephone available in the conference room.

This invitation is merely to set up the call-in number.

Best regards,

Len

To: "Nagel, Carsten (N/EA-521)" [Carsten.Nagel@audi.de]; Kissling, Karlheinz (N/EA-

521)" [Karlheinz.Kissling@AUDI.DE]; im Snyder/AA/USEPA/US@EPA[]

From: "Kata, Leonard"

Sent: Mon 5/7/2012 1:05:45 PM Subject: Audi Start Stop Demo.

When: Tuesday, May 08, 2012 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: EPA Conference Room C126

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*

Hello Jim:

I am resending because the conference call number did not appear (operator error??). I hope that it works this time.

This is a call-in number for the Audi Start-Stop demo and discussion.

Best regards,

Len

You have been invited to attend a conference call. Please accept or reject. Details are below.

Audio Conference Information:

**Ex.** 6

To: "Nagel, Carsten (N/EA-521)" [Carsten.Nagel@audi.de]; Kissling, Karlheinz (N/EA-

521)" [Karlheinz.Kissling@AUDI.DE]; im Snyder/AA/USEPA/US@EPA[]

From: "Kata, Leonard"

Sent: Mon 5/7/2012 1:05:44 PM Subject: Update: Audi Start Stop Demo.

When: Tuesday, May 08, 2012 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: EPA Conference Room C126

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*

Hello Jim:

I am resending because the conference call number did not appear (operator error??). I hope that it works this time.

This is a call-in number for the Audi Start-Stop demo and discussion.

Best regards,

Len

You have been invited to attend a conference call. Please accept or reject. Details are below.

Audio Conference Information:

**Ex.** 6

To: Cc: From:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com] "Giles, Michael"
Sent: Subject:	Mon 5/7/2012 4:48:29 PM VW Group - Cert Request for Audi Test Group DADXV02.53UK (TTRS)
Hello Jim,	
FYI, we jus	t submitted a certification request for the above test group (Audi TTRS).
Note, this	is a carryover test group with no new tests or models. Please let me know if you have any about this.
·	
Thanks,	
Mike	
Michael Gi	les
Certification	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Ham	in Road
Auburn Hil	ls, MI 48326
United Sta	tes of America
Phone +1-2	248-754-4229
FAX +1-248	3-754-4207

From: "Giles, Michael"

**Sent:** Mon 5/7/2012 8:33:03 PM

Subject: RE: audi testing snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

Thanks Jim

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, May 07, 2012 4:22 PM

To: Giles, Michael Subject: audi testing

The Audi 3.0L is indeed ready for testing tomorrow, with S/Stop disabled. I couldn't find out when it will test so best recommendation is to show up at 7:00.

The evap test result was .50g. Results should show up tomorrow in Verify.

The 4.0L is here and scheduled for wednesday.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael" < michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William" < William.Rodgers@vw.com>

Date: 05/07/2012 12:48 PM

Subject: VW Group - Cert Request for Audi Test Group DADXV02.53UK (TTRS)

Hello Jim,

FYI, we just submitted a certification request for the above test group (Audi TTRS).

Note, this is a carryover test group with no new tests or models. Please let me know if you have any questions about this.

Thanks, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

**From:** "Rodgers, William (EEO)" **Sent:** Wed 5/9/2012 12:17:37 PM

Subject: RE: VW Group - Request for AECD Approval

snyder.jim@epa.gov William.Rodgers@vw.com michael.giles@vw.com Leonard.Kata@vw.com william.rodgers@vw.com

Hi Jim.

I was out of the office for a couple weeks dealing with a death in the family.

I'm back now but please continue dealing with Mike or Len on current issues. Feel free to contact me if you can't reach them.

Thanks Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Friday, May 04, 2012 4:07 PM

To: Rodgers, William

Subject: Re: VW Group - Request for AECD Approval

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Rodgers, William" < William.Rodgers@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Giles, Michael" <michael.giles@vw.com>, "Kata, Leonard" <Leonard.Kata@vw.com>

Date: 04/16/2012 01:59 PM

Subject: VW Group - Request for AECD Approval

## Hello Jim,

I have submitted to Verify two 2013 AECD approval requests for the following test groups. Please contact Len Kata or myself if you have any questions about these requests.

DVWXV02.0U5N – TDI (non-SCR) DVWXV02.0U4S – TDI with SCR

Regards,

Bill Rodgers Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc. Engineering and Environmental Office 3800 Hamlin Rd. Auburn Hills, MI 48436 United States office (248) 754-4219 fax (248) 754-4207 william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Giles, Michael (EEO)" Wed 5/9/2012 2:15:52 PM Audi stop start follow up
Hello Jim,	
l left a voic	e message, but to clarify:
mode setti	Audi cert team still has the 4.0L demo car in Ann Arbor, with a correction for the start/stop ng problem after key-off. Please let us know if you would like to have a look at this; It uses the s the 3.0L and this software is not emissions related as it is part of a body control unit (not
	se let us know if there are any issues with respect to the validation of the 3.0L test results the above issue.
Thanks,	
Mike	
Michael Gi	les
Certificatio	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	ls, MI 48326
United Sta	tes of America
Phone +1-2	248-754-4229
FAX +1-248	3-754-4207

**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA;"Giles, Michael (EEO)" [michael.giles@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]

From: "Rodgers, William (EEO)"
Sent: Thur 5/10/2012 6:17:02 PM

Subject: VW Group - VID D3UF-DAQ Audi A8 3.0T

william.rodgers@vw.com

Hello Jim,

We are finished with testing the Audi A8 3.0L, VID D3UF-DAQ currently at your facility. Please release it for pick up on Friday May11th.

Regards,

**Bill Rodgers** 

**Emissions Certification Engineer** 

VOLKSWAGEN Group of America, Inc. Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

**United States** 

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

To: Vincent Mazaitis/AA/USEPA/US@EPA[]

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]; im Snyder/AA/USEPA/US@EPA[]

**From:** "Rodgers, William (EEO)" **Sent:** Thur 5/10/2012 6:21:21 PM

**Subject:** Audi test results william.rodgers@vw.com

Hello Vince,

When available, please scan and forward a copy of the test results conducted on Wed. May 9th for Audi test vehicle D3UJ-DAQ. Send to Mike Giles and myself.

Thanks

**Bill Rodgers** 

**Emissions Certification Engineer** 

VOLKSWAGEN Group of America, Inc. Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

**United States** 

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

To: "Rodgers, William (EEO)" [William.Rodgers@vw.com]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Giles, Michael (EEO)"

[michael.giles@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]

From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

Sent: Fri 5/11/2012 11:23:25 AM Subject: Re: Audi test results

<u>D3UJ-DAQ 5-9-12.pdf</u> william.rodgers@vw.com

Hello Bill,

Please find enclosed the Laboratory Test Data for D3UJ-DAQ Config. 00 tested on 5-9-12. The official results are in Verify.

If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

From: "Rodgers, William (EEO)" < William.Rodgers@vw.com>

To: Vincent Mazaitis/AA/USEPA/US@EPA

Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>, Jim Snyder/AA/USEPA/US@EPA

Date: 05/10/2012 02:21 PM Subject: Audi test results

Hello Vince,

When available, please scan and forward a copy of the test results conducted on Wed. May 9th for Audi test vehicle D3UJ-DAQ. Send to Mike Giles and myself.

Thanks

**Bill Rodgers** 

**Emissions Certification Engineer** 

VOLKSWAGEN Group of America, Inc. Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

**United States** 

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

					L Laboratory				cvs
				atory Test Re	sults- Refer to Vi		for Official Data		
			Test Number:		3	<u>-</u>	Vehicle ID:	D3UJ-DAQ	
	rmation		Test Date:				MFR Name	AUDI	
UNITED	STATE		Start / Hot Soak:		42		MFR Codes:	640	ADX
6 1	, 's'	· F	uel Container ID:	F00023			Config #:	00	
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		Phase 1	0.149	4.367	0.028	486.8	0.050	0.102 / 0.106	18.061
		Phase 2	0.004	0.020	0.006	507.7	0.000	0.004 / 0.005	17.578
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sults				Laboratory To				cvs
				its- Refer to VER	IFY Reports for			
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1.5 a 2	Phase 1	0.534	15.625	0.100	1741.9	0.179	0.366	
同して	Phase 2	0.017	0.077	0.023	1951.5	0.000	0.017	
	Pḥase 3	0.007	0.089	0.024	1461.1	0.006	0.002	
st Conditions			Phase 1	Phoco 2	Dhase 9	Dhoon 4		
at Conomicals	D.	arometer (inHg)	28.86	<u>Phase 2</u> 28.86	<u>Phase 3</u> 28.86	Phase 4		
		ll Temp (degF)	28.86 72.36	72.32	28.86 72.14			
	Avg Ct	w Point (degF)	48.97	48.76	72.14 49.11			
Sn		lity (grains/lbm)	53.40	52.98	53.69			
- Oh		Ox Corr Factor	0.9078	0.9062	0.9090			
	•	Dilution Factor	10.758	16.360	12.910			
		mix (scf @68F)	2808.81	4803.12	2803.33			
		mix (scf@68F)	2831.05	4841.40	2825.63			
	CVS Flow R	tate Avg (scfm)	332.08	331.21	331.36			
	. F	an Placement: C	ne Fan - Up - F	Front				
	Pha	se Time (secs)	507.51	870.10	507.60			
		istance (miles)	3.578	3.844	3.582			
		sis Time (secs)	1003.8	247.1	141.9			
				•				
	•							
				ŧ				

MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number 1E+07

<u>HC</u> 0.0178

<u>CO</u> 0.254 <u>NOx</u> 0.026

CO<sub>2</sub>

NonMeth HC

MPG

442

MFR Lab: Audi AG Neckarsulm

Odometer 4456 M

20.1

MPG is 7.79 % higher than EPA MPG

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

v120405 - d329\_

EPAVDAEm120509101820

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				NVFE	L Laboratory Te	est Data		F	PARTICULATE
		-	Final Labor	atory Test Res	ults- Refer to VER	IFY Reports f			
Test Infor	metion		Test Date:	2012-0176-003				D3UJ-DAQ	
JAITED S	TATES	Fuel		10:37:27 / 09:4	2		MFR Name MFR Codes: Config #:	640	ADX
	Day Call		Fuel Type:	61 Tier 2 Cert	Test Fuel		Transmission:		
1 W		Tes	st Procedure:	21 Federal fuel	2-day exhaust (w/c		Shift Schedule:		
TAL PRO	A EETING		ition Method:	Gasoline		Be	ginning Odometer:		
		rieu	est nemarks;				Drive Schedule:		
······································		***************************************					Soak Period:		s corrected for buoyancy
<u>Particulat</u>	Filter	CARREST	<u>Filter</u>	Tare	Gross	Net Wt	Total Mass	Total Mass	
	Sampler		No.	(Pre Wt)	(Post Wt)	mg	mg	mg / mi	comment
Phase 1		Α	706728	147.8716	147.9064	0.03474	13.217	3.694	
		B C	706731	145.9229	145,9582	0.03534	13.463	3.763	
		U	706734	145.2991	145.3427	0.04365	16.764	4.685	
	Remarks:								
							•	•	•
Phase 2	ą.	A	706729	145.8620	145.8794	0.01742	6.605	1.718	
		B C	706732 706735	146.3159 145.5808	146.3361	0.02022	7.669	1.995	
			700733	140.0808	145.6044	0.02362	8.968	2.333	
	Remarks:								
Phase 3		Α	706730	147.8957	147 0005	0.00474	45.45-		
. Huse o		В	706730	147.8753	147.9305 147.8940	0.03474 0.01872	13.195	3.684	
	•	č	706736	144.1243	144.1443	0.02002	7.109 7.629	1.985 2.130	
							7.020	2.100	
	Remarks:				i,				
	nemains.						•	•	•
Phase 4									
	٠								
							•	•	
	Remarks:	This	test has part	<u>culate results.</u>	•				
Average Re	esults					Net Wt	Total Mass	Total Mass	
						mg	mg	mg/mi	
	Phase					0.03791	14.481	4.047	
	Phase					0.02042	7.747	2.016	
	Phase	93				0.02449	9.311	2.600	
							•		
			A	ll filter weights are o	corrected for buoyancy.				
	Weighted All							2.59741	
	Filter Stabilit Net or 0.01 r			<u>Tare</u>	Gross	<u>Net Wt</u>	Stability Check		: D329 - AWD
≥70 UI AVQ		ng 01	No.	(Pre Wt)	(Post Wt)	mg o ooost	PASS/FAIL		: 5000
	U.	VΙ	1 2	144.64335 143.27654	144.64416 143.27565	0.00081	PASS	EPA Set Co A	
	•		~	170.67009	140.27000	-0.00089	PASS	EPA Set Co E	
								#1 V PQ! OO (	. 0.01400
100105 300	n	100	104000						cl Mexa 7200dle
120405 - d32	9EPAVDAE	m1205091	101820		Page 1 of 2			Print Ti	me 10-May-2012 15:07

of the life	Paris,		NVFE	L Laboratory Te	st Data		PARTICULATE
	2)	Final Laborat	ory Test Res	uits- Refer to VERIF		Official Data	TAITIOULATE
Viene.	ord .	Test Number: 2	012-0176-003	3			: D3UJ-DAQ
WEIGHING	CHAMBER	<u>Buoyancy</u>	Operator	Chamber Temp	Dew Point	<u>Barometer</u>	Last Change in Status
<b>.</b>	Timestamp	Factor	(id)	(°F)	(°F)	(*Hg)	Status @ timestamp
Pre-test	5/8/12 13:06	1.0011050	022298	71.7	49.2	28.85	NORM @ 05/07/12 14:51:29
Post-test	5/9/12 12:58	1.0011050	022298	71.6	49.1	28.84	NORM @ 05/07/12 14:51:29
<u> Fest Condi</u>			Phase 1	Phase 2	Phase 3	Phase 4	
		Barometer (inHg)	28.86	28.86	28.86		
	•	Cell Temp (degF)	72.36	72.32	72.14		
		Dew Point (degF)	48.97	48.76 ,	49.11		
		idity (grains/lbm)	53.40	52.98	53.69		
		NOx Corr Factor	0.9078	0.9062	0.9090		
		Dilution Factor	10.76	16.36	12.91		
		Vmix (scf @68F)	2808.81	4803.12	2803.33		
		me A (scf @68F)	7.440	12.767	7.438		
	Sample Volur	ne B (scf @68F)	7.431	12.764	7.440		
		ne C (scf @68F)	7.371	12.754	7.415		
_		ne D (scf @68F)					
San	ple Volume Ave		7.414	12,762	7.431		
		/mix (scf @68F)	2831.05	4841.40	2825.63	*	
		hase Time (sec)	507.51	870.10	507.60		
		Distance (miles)	3.578	3.844	3.582		
	PSU	Probe A (degC)					
		Probe B (degC)					
		Probe C (degC)					
		Dil Air A (degC)	44.5	42.5	A1 E		
		Dil Air B (degC)	44.8	42.5 44.5	41.5		
		Dil Air C (degC)	43.8	42.9	43.6		
		J Filter A (degC)	45.8	46.2	41.8		
		J Filter B (degC)	43.8 47.7		46.3		
				47.3	48.0		
		J Filter C (degC)	45.6	45.4	45.2		
		Dil Flow A (Ipm)	29.9	29.9	29.9		
		Dil Flow B (Ipm)	29.9	29.9	29.9		
		Dil Flow C (ipm)	30.0	29.9	29.9		•
		A Proportionality		,			
		3 Proportionality		• .			
	FOUL	2 Proportionality					
	•						
				è			
20405 · d329	EPAVDAEm120	509101820		Page 2 of 2			Print Time 10-May-2012 15:07

			NVFEL	Laboratory Te	st Data			CVS
		Final Labor	atory Test Resu	Its- Refer to VERI	FY Reports for			
rant late			2012-0176-002				D3UJ-DAQ	
Test Information	!	Test Date:		t		MFR Name		100
Julied Starte	_	Key Start:				MFR Codes:		ADX
( C) (	) \	uel Container ID:				Config #:		
The state of the s			61 Tier 2 Cert T			Transmission:		
	/ Col	Test Procedure:		etprep_hwfet)		Shift Schedule:		
AL PROTECTS		culation Method:	Gasoline		Begi	nning Odometer:		
	ļ-	Pretest Remarks:				Drive Schedule:	hwfet_hwfet	
,,,,,,					······································			
Bag Data		HC-FID	CO	NOx .	CO2	CH4	NonMeth HC	
<u>Phase 1</u>		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample		3.369	4.485	0.115	0.893	2.334	,	
Ambien		2.245	0.079	0.000	0.050	1.963		
Net Concentration	1	1.274	4.412	0.115	0.846	0.502	0.728	
340	Remarks:	:						
<u>Phase 2</u> Sample				4				
Sample Ambien								
Ambien Vet-Concentration								
vocconcentration								
	Remarks:							
<u>hase 3</u>								
Sample								
Ambient								
Vet Concentration	1							
	•							
	Remarks:							
hase 4								
Sample								
Ambient				4		•		
let Concentration								
	*							
	Remarks:							
esults		HC-FID	CO	<u>NOx</u>	<u>CO2</u>	CH4	NMHC / NMOG	Vol MPG
	Phase 1	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
	rnase 1	0.012	0.087	0.003	262.3	0.006	0.007 / 0.007	34.004
	Ť							
						(	NMOG=1.04xNMHC)	ı
uel Economy		Gasoline MPG				Dyno Settings	Dyno #	D329 - AWD
	Phase 1	33.93				PAHO Setunda	Dyno #: Inertia:	
	• • • • •						EPA Set Co A:	
							EPA Set Co B:	
							EPA Set Co C:	
					1	±		
0010E J900 ***	, 41 m 4 m 400	CORTON			<del></del>		Emiss-Bench:	
20405 - d329 <u>EP</u>	AVDAEm120	DU9120/55		Page 1 of 2	·		Print Time	10-May-2012 15:0

		Final Laborat	ory Test Resul	Laboratory T ts- Refer to VER	est Data NFY Reports for	Official Data	<u> </u>	cvs
		Test Number: 2	012-0176-002				D3UJ-DAQ	
Results  GULTED STATES  TO ASSOCIATE PROTECTION	Phase 1	<u>HC-FID</u> (grams) 0.128	CO (grams) 0.892	NOx (grams) 0.035	<u>CO2</u> (grams) 2687.9	<u>CH4</u> (grams) 0.058	NMHC (grams) 0.073	Meth Response 1.087
Test Conditions	Avg Ce De	arometer (inHg) ell Temp (degF) ew Point (degF) lity (grains/lbm)	Phase 1 28.86 72.20 48.93	Phase 2	Phase 3	Phase 4		

CO2 Dilution Factor 14.987 CFV Vmix (scf @68F) 6130.24

NOx Corr Factor

CVS Flow Rate Avg (scfm)

Fan Placement: One Fan - Up - Front

0.9076

480.74

Phase Time (secs) 765.10 Distance (miles) 10.247 Bag Analysis Time (secs) 126.0

MFR Test Results

for Procedure 3 HWFE

MFR Number 1E+07

<u>HC</u> 0.0017

<u>CO</u> 0.013

<u>NOx</u> 0.004

CO2

**NMOG** 

NonMeth HC

Odometer 4467 M

**MPG** 

34.7 MPG is 2.28 % higher than EPA MPG

0.0009

MFR Lab: Audi AG Neckarsulm

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

v120405 - d329

EPAVDAEm120509120755

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			NVFEL	Laboratory Te	st Data		W	cvs			
		Final Labora	atory Test Resu 2012-0176-001	its- Refer to VERI	FY Reports fo		Dallibyo				
Test Information		Test Number: Test Date: Key Start: Fuel Container ID:	5/9/2012 13:45:06	ŕ		MFR Name MFR Codes: Config #:	640	ADX			
SPACE COLOR OF THE PROTECTION			61 Tier 2 Cert Test Fuel 90 US06 (us06warmup_us06)		Beg	Transmission: Shift Schedule: inning Odometer: Drive Schedule:	S A09980041 004630.0 MI				
Bag Data	**************************************	HC-FID	CO	NOx	<u>CO2</u>	CH4	NonMeth HC				
<u>Phase 1</u> Sample		(ppmC) 3.700	(ppm) 6.568	(ppm) 0.403	(%) 1.208	(ppm) 2.287	(ppmC)				
Ambient Net Concentration		2.528 1.400	0.082 6.493	0.008 0.396	0.043 1.169	1.949 0.513	0.842				
	Remark	s:									
Phase 2 Sample Amblent let Concentration				<b></b>							
hase 3 Sample Ambient let Concentration		<b>3:</b>									
hase 4	Remarks	3 <b>:</b>									
Sample Amblent et Concentration				,							
	Remarks: This test has particulate results.										
esult <u>s</u>	Phase 1	HC-FID (gpm) 0.016	<u>CO</u> (gpm) 0.151	<u>NOx</u> (gpm) 0.014	<u>CO2</u> (gpm) 427.9	<u>CH4</u> (gpm) 0.007	NMHC / NMOG (gpm) 0.010 / 0.010	Vol MPG (mpg) 20.846			
						(	NMOG=1.04xNMHC	)			
uel Economy	Phase 1	Gasoline MPG 20.80				Dyno Settings	Inertia: EPA Set Co A: EPA Set Co B:	-6.32 0.2344			
	•			÷			EPA Set Co C:				
20405 - d329 EP	AVDAEm12	0509131817	1	Page 1 of 2			Emiss-Bench:	Mexa 7200dle e 10-May-2012 14:5			

NVFEL Laboratory Test Data
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Phase 2

Test Number: 2012-0176-001

Vehicle ID: D3UJ-DAQ

Results

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(Salara

Results

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(Salar

HC-FID CO (grams) (grams) Phase 1 0.129 1.209

<u>NOx</u> (grams) 0.110 CO2 (grams) 3422.8

Phase 3

<u>CH4</u> (grams) 0.055

Phase 4

<u>NMHC</u> (grams) 0.078

Meth Response 1.087

CVS

Test Conditions

| Barometer (inHg) | 28.84 | 28.84 | 28.84 | 72.27 | 28.86 | 48.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 28.86 | 2

CFV Vmix (scf @68F) 5623.12 Total Vmix (scf@68F) 5649.30

CVS Flow Rate Avg (scfm)

560.16

Fan Placement: USO6 Only - One Large Fan - Up - Front

Phase Time (secs) 602.30
Distance (miles) 8.000
Bag Analysis Time (secs) 136.1

MFR Test Results

for Procedure 90 US06

MFR Number 1E+07 <u>HC</u> 0.011 <u>CO</u> 0.077 <u>NOx</u> 0.015

CO2 373

NMOG

NonMeth HC 0.0063

Odometer 4489 M MPG 23.8

MFR Lab: Audi AG Neckarsulm

MPG is 14.43 % higher than EPA MPG

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

v120405 - d329

EPAVDAEm120509131817

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## **NVFEL Laboratory Test Data** Final Laboratory Test Results- Refer to VERIFY Reports for Official Data Test Number: 2012-0176-001 Vehicle I

Vehicle ID: D3UJ-DAQ

Test Date: 5/9/2012

MFR Name AUDI



MFR Codes: 640

ADX

**PARTICULATE** 



Key Start: 13:45:06 Fuel Container ID: F00023

Fuel Type: 61 Tier 2 Cert Test Fuel

Config #: 00 Transmission: S

Test Procedure: 90 US06 (us06warmup\_us06) Calculation Method: Gasoline

Shift Schedule: A09980041

Beginning Odometer: 004630.0 MI

Pretest Remarks:

CE PRO		Pret	est Remarks:			·	Drive Schedule	: us06_us06	
Particulate	Filter		<u>Filter</u>	Toro				All filter weights are o	
Phase 1	Sampler .	A B C	No. 416748 416749 416750	Tare (Pre Wt) 143.7033 146.0568 143.2798	<u>Gross</u> (Post Wt) 143.7681 146.0997 143.3407	Net Wt mg 0.06469 0.04277 0.06089	Total Mass mg 41.796 27.607 39.620	Total Mass mg / mi 5.224 3.451 4.953	<u>Filter</u> comment
	Remarks:							•	
Phase 2									
	Remarks:								
hase 3	cemarks;						•	•	٠
F	Remarks:				,				
hase 4	•								
R	emarks;	<u>This</u>	s test has partic	ulate results.					
verage Res	sults Phase	1		en e		Net Wt mg 0.05612	Total Mass mg 36.341	Total Mass mg / mi 4.543	
			Ali f	ilter welghts are co	prrected for buoyancy.				
				•	1				
eference F eference F eferen	Iter Stability Net or 0.01 m 0.0	g	No. 1	<u>Tare</u> (Pre Wt) 144.64406 143.27515	<u>Gross</u> (Post Wt) 144.64707 143.27655	Net Wt mg 0.00301 0.00141	Stability Check PASS/FAIL PASS PASS	Inertia: EPA Set Co A: EPA Set Co B: EPA Set Co C:	-6.32 0.2344 0.01488
20405 - d329_	EPAVDAEm	1205091	131817		Page 1 of 2			Emissions Bencl	Mexa 7200dle

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Final Labora		NVFEI	Laboratory Te	PARTICULATE			
		Final Laborat Test Number: 2	ory Test Resi	ults- Refer to VERIF			
WEIGHING	CHAMBER	Buoyancy	Operator	Chamber Temp	Dew Point		D3UJ-DAQ
Pre-test Post-test	Timestamp 5/9/12 9:35 5/10/12 9:50	Factor 1.0011050 1.0011092	(id) 022298 022298	(°F) 71.7 72	(°F) 49.2 49.7	<u>Barometer</u> ("Hg) 28.85 28.98	Last Change in Status Status @ timestamp NORM @ 05/07/12 14:51:29 NORM @ 05/10/12 08:53:46
Fest Condi	Avg C D Specific Humi I CFV N Sample Volum Sample Volum Sample Volum Sample Volum Ple Volume Aver Total N	Barometer (inHg) cell Temp (degF) dew Point (degF) dity (grains/lbm) NOx Corr Factor Dilution Factor /mix (scf @68F) ne A (scf @68F) ne B (scf @68F) ne C (scf @68F) ne C (scf @68F) rage (scf @68F) /mix (scf @68F) nase Time (sec) Distance (miles)	Phase 1 28.84 72.27 48.86 53.22 0.9071 11.08 5623.12 8.744 8.753 8.681 8.726 5649.30 602.30 8.000	Phase 2	Phase 3	Phase 4	
	PSU PSU PSU PSU PSU PSU PSU PSU E PSU E PSU A	Probe A (degC) Probe B (degC) Probe C (degC) Dil Air A (degC) Dil Air B (degC) Dil Air C (degC) Filter A (degC) Filter B (degC) Filter C (degC) Dil Flow A (Ipm) Dil Flow B (Ipm) Dil Flow C (Ipm) A Proportionality Proportionality	41.7 43.6 41.9 45.6 47.0 44.7 29.6 29.6 29.6				
	·						

				L Laboratory Te				cvs
				sults- Refer to VERIF	Y Reports			
Test Informatio	212	Test Number: Test Date:	2012-0176-00	14			D3UJ-DAQ	
	211 '	Key Start:				MFR Name MFR Codes:		ADX
THITEO STATES	, ,	Fuel Container ID:			•			AUA
	টু '			Took Front		Config #:		
	<b>5</b> )	Toet Procedure:	61 Tier 2 Cert	Test Fuer (us06warmup_2bagus	~OC\	Transmission:		
( ) A	e Co	ilculation Method:	Gasolino	(usoowannup_zoagu:		Shift Schedule:		
AL PROTECT		Pretest Remarks:	Gasonie	4	D	eginning Odometer:		
-		rretest Hemarks:				Drive Schedule:	us06warmup_2t	pagus06
Bag Data	·	HC-FID	CO	<u>NOx</u>	<u>CO2</u>	CH4	NonMeth HC	
Phase 1		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Samı		2.803	4.157	0.370	1.114	2.191		
Amble		1.871	0.070	0.006	0.043	1.937		
Net Concentrati	on	1.089	4.092	0.365	1.075	0.415	0.638	
Phase 2	Remarks	ı:		ĸ.				
Samp	ole	2.462	4.306	0.238	1.224	2.085		
Ambie		1.848	0.063	0.006	0.043	1.941		
Net Concentrati	on	0.783	4.249	0.232	1.185	0.322	0.434	
Phase 3 Samp Amble Net Concentration	nt			,				
hase 4	Remarks	•						
Samp	ilo.							
Ambie								
let Concentration							,	
	Remarks			•				
<u>lesults</u>		HC-FID	,co	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	NMHC / NMOG	Vol MPG
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
	Phase 1		0.170	0.023	700.7	0.010	0.013 / 0.014	12.731
	Phase 2	0.007	0.076	0.006	334.7	0.003	0.004 / 0.004	26.658
	Composite	0.01036	0.09693	0.00984	415.272	0.00476	(NMOG=1.04xNMHC) 0.0059 / 0.0061	
uel Economy	Composite	0.01036 Gasoline MPG	0.09693	0.00984	415.272	0.00476	0.0059 / 0.0061	
uel Economy	Composite	Gasoline MPG	0.09693	0.00984	415.272		0.0059 / 0.0061 Dyno #:	D329 - AWD
uel Economy		Gasoline MPG 12.70	0.09693	0.00984	415.272	0.00476	0.0059 / 0.0061 Dyno #: Inertia:	D329 - AWD 5000
uel Economy	Phase 1	Gasoline MPG 12.70	0.09693	0.00984	415.272	0.00476	0.0059 / 0.0061 Dyno #: Inertia: EPA Set Co A:	D329 - AWD 5000 -6.32
uel Economy	Phase 1	Gasoline MPG 12.70	0.09693	0.00984	415.272	0.00476 Dyno Settings	0.0059 / 0.0061 Dyno #: Inertia:	D329 - AWD 5000 -6.32 0.2344
uel Economy	Phase 1	Gasoline MPG 12.70 26.60	0.09693	0.00984	415.272	0.00476	0.0059 / 0.0061 Dyno #: Inertia: EPA Set Co A: EPA Set Co B:	D329 - AWD 5000 -6.32 0.2344 0.01488

		Final Laborat Test Number: 2	ory Test Resul	Laboratory T ts- Refer to VEF	est Data IFY Reports for			cvs
Results  THE STATE OF THE STATE	Phase 1 Phase 2	HC-FID (grams) 0.039 0.043	CO (grams) 0.299 0.476	NOx (grams) 0.040 0.039	CO2 (grams) 1233.0 2085.6	Vehicle ID: <u>CH4</u> (grams) 0.017 0.021	D3UJ-DAQ NMHC (grams) 0.023 0.024	Meth Response 1.087
	· Avg Cei Der ecific Humidi NO CO2 I CFV Vn	rometer (inHg) Il Temp (degF) w Point (degF) ty (grains/lbm) Ox Corr Factor Dilution Factor nix (scf @68F)	Phase 1 28.84 72.11 49.17 53.87 0.9097 12.018 2213.55	Phase 2 28.84 72.01 48.99 53.50 0.9082 10.946 3397.92	Phase 3	Phase 4		
	Phas Dis	an Placement: Use Time (secs) stance (miles) s Time (secs)	SO6 Only - One 129.91 1.760 131.0	Large Fan - Up 365.00 6.232 353.0	- Front 107.10			
				,				

MFR Number 1E+07

<u>HC</u> 0.011

<u>CO</u> 0.077 <u>NOx</u> 0.015

<u>CO2</u>

**NMOG** 

MFR Lab: Audi AG Neckarsulm

NonMeth HC 0.0063

Odometer 4489 M

**MPG** 

23.8

MPG is 10.97 % higher than EPA MPG

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

v120405 - d329 EPAVDAEm120509140332

Page 2 of 2

Print Time 10-May-2012 15:09

**To:** Vincent Mazaitis/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]

Cc: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"
Sent: Fri 5/11/2012 11:45:04 AM
Subject: RE: Audi test results

William.Rodgers@vw.com michael.giles@vw.com william.rodgers@vw.com

Thanks Vince.

Could you lets us know if the 3 Liter car is released? If so we will pick it up.

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]

Sent: Friday, May 11, 2012 7:23 AM

To: Rodgers, William (EEO)

Cc: Jim Snyder; Giles, Michael (EEO) Subject: Re: Audi test results

Hello Bill,

Please find enclosed the Laboratory Test Data for D3UJ-DAQ Config. 00 tested on 5-9-12. The official results are in Verify.

If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

To: Vincent Mazaitis/AA/USEPA/US@EPA

Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>, Jim Snyder/AA/USEPA/US@EPA

Date: 05/10/2012 02:21 PM Subject: Audi test results

Hello Vince,
When available, please scan and forward a copy of the test results conducted on Wed. May 9th for Audi test vehicle D3UJ-DAQ. Send to Mike Giles and myself.
Thanks
Bill Rodgers
Emissions Certification Engineer
VOLKSWAGEN Group of America, Inc. Engineering and Environmental Office
3800 Hamlin Rd.
Auburn Hills, MI 48436
United States
office (248) 754-4219
fax (248) 754-4207
william.rodgers@vw.com
P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

To: "Giles, Michael (EEO)" [michael.giles@vw.com]

**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]

From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

Sent: Fri 5/11/2012 12:09:39 PM
Subject: RE: Audi test results
William.Rodgers@vw.com
michael.giles@vw.com
william.rodgers@vw.com

Hello Mike,

D3UF-DAQ has been released. You may pick the vehicle up at any time through Security as usual. They have the release slip and keys.

Thanks,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Vincent Mazaitis/AA/USEPA/US@EPA, "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 05/11/2012 07:46 AM Subject: RE: Audi test results

Thanks Vince.

Could you lets us know if the 3 Liter car is released? If so we will pick it up.

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]

Sent: Friday, May 11, 2012 7:23 AM

To: Rodgers, William (EEO)

Cc: Jim Snyder; Giles, Michael (EEO) Subject: Re: Audi test results

Hello Bill,

Please find enclosed the Laboratory Test Data for D3UJ-DAQ Config. 00 tested on 5-9-12. The official results are in Verify.

If you have any questions or concerns, please contact me.

Thanks Bill,
Vince Mazaitis
From: "Rodgers, William (EEO)" <william.rodgers@vw.com> To: Vincent Mazaitis/AA/USEPA/US@EPA Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>, Jim Snyder/AA/USEPA/US@EPA Date: 05/10/2012 02:21 PM Subject: Audi test results</michael.giles@vw.com></william.rodgers@vw.com>
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United States
office (248) 754-4219
fax (248) 754-4207
william.rodgers@vw.com

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To: "Giles, Michael (EEO)" [michael.giles@ww.com]
Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]
From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

Sent: Fri 5/11/2012 1:36:00 PM
Subject: RE: Audi test results
Verify D3UJ-DAQ 5-9-12.pdf
William.Rodgers@vw.com
michael.giles@vw.com
william.rodgers@vw.com

Hello Mike,

Here's the Verify results. Sorry the sheets are not complete (pages) but I think all the information you need is included. If you have any questions or concerns, please contact me.

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Thanks,
Vince Mazaitis
From: "Giles, Michael (EEO)" <michael.giles@vw.com> To: Vincent Mazaitis/AA/USEPA/US@EPA Date: 05/11/2012 08:31 AM Subject: RE: Audi test results</michael.giles@vw.com>
Vince,
Can you please send me the VERIFY test numbers? I think only Bill gets the email with this and he is our until Tuesday.
Thanks,
Mike

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Sent: Friday, May 11, 2012 7:23 AM

To: Rodgers, William (EEO)

Cc: Jim Snyder; Giles, Michael (EEO) Subject: Re: Audi test results

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From: "Rodgers, William (EEO)" <william.rodgers@vw.com> To: Vincent Mazaitis/AA/USEPA/US@EPA Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>, Jim Snyder/AA/USEPA/US@EPA Date: 05/10/2012 02:21 PM Subject: Audi test results</michael.giles@vw.com></william.rodgers@vw.com>
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United States

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

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To: Jim Snyder/AA/USEPA/US@EPA[] From: "Giles, Michael (EEO)" Sent: Mon 5/14/2012 12:10:02 PM Subject: FW: Release of Audi Test Vehicle D3UJ-DAQ [mailto:Mazaitis.Vincent@epamail.epa.gov] michael.giles@vw.com mailto:Mazaitis.Vincent@epamail.epa.gov William.Rodgers@vw.com michael.giles@vw.com william.rodgers@vw.com	
Hi Jim,	
I think I should have sent the email below to you about releasing the Audi A8 – sorry about that. Please let us know status when you can.	
Thanks,	
Mike	
From: Giles, Michael (EEO) Sent: Friday, May 11, 2012 2:17 PM To: 'Vincent Mazaitis' Cc: Thomas, Richard (EEO) (Richard.Thomas@vw.com); Berenz, Sebastian (EEO) Subject: Release of Audi Test Vehicle D3UJ-DAQ	
Hello Vince,	
We are finished with the A8 4.0L (vehicle D3UJ-DAQ). Please let us know when it is released and we will arrange to have it picked up. I understand that we may be dropping off an in-use vehicle mid-week, we may decide to handle both tasks then.	
Please advise.	
Thanks,	

1

Mike
From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov] Sent: Friday, May 11, 2012 9:36 AM To: Giles, Michael (EEO) Cc: Jim Snyder Subject: RE: Audi test results
Hello Mike,
Here's the Verify results. Sorry the sheets are not complete (pages) but I think all the information you need is included. If you have any questions or concerns, please contact me.
Thanks,
Vince Mazaitis
From: "Giles, Michael (EEO)" <michael.giles@vw.com> To: Vincent Mazaitis/AA/USEPA/US@EPA Date: 05/11/2012 08:31 AM Subject: RE: Audi test results</michael.giles@vw.com>
Vince,
Can you please send me the VERIFY test numbers? I think only Bill gets the email with this and he is out until Tuesday.
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Mike

To: Rodgers, William (EEO) Cc: Jim Snyder; Giles, Michael (EEO) Subject: Re: Audi test results
Hello Bill,
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Hello Vince,
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Thanks
Bill Rodgers
Emissions Certification Engineer

3

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]

VOLKSWAGEN Group of America, Inc. Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

**United States** 

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

To: "Giles, Michael (EEO)" [michael.giles@ww.com]  Cc: "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Berenz, Sebastian (EEO)"  [Sebastian.Berenz@ww.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  Sent: Mon 5/14/2012 1:16:29 PM  Subject: Re: Release of Audi Test Vehicle D3UJ-DAQ  michael.giles@vw.com  mailto:Mazaitis.Vincent@epamail.epa.gov
William.Rodgers@vw.com michael.giles@vw.com william.rodgers@vw.com
Hello Mike,
I'll release it this morning.
Thanks Mike,
Vince Mazaitis
From: "Giles, Michael (EEO)" <michael.giles@vw.com> To: Vincent Mazaitis/AA/USEPA/US@EPA Cc: "Thomas, Richard (EEO)" <richard.thomas@vw.com>, "Berenz, Sebastian (EEO)" <sebastian.berenz@vw.com> Date: 05/11/2012 02:20 PM Subject: Release of Audi Test Vehicle D3UJ-DAQ</sebastian.berenz@vw.com></richard.thomas@vw.com></michael.giles@vw.com>
Hello Vince,
We are finished with the A8 4.0L (vehicle D3UJ-DAQ). Please let us know when it is released and we will arrange to have it picked up. I understand that we may be dropping off an in-use vehicle mid-week, we may decide to handle both tasks then.
Please advise.
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Mike
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From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov] Sent: Friday, May 11, 2012 9:36 AM
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Cc: Jim Snyder
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To: Vincent Mazaitis/AA/USEPA/US@EPA
Date: 05/11/2012 08:31 AM
Subject: RE: Audi test results
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Sent: Friday, May 11, 2012 7:23 AM

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From: "Rodgers, William (EEO)" <william.rodgers@vw.com> To: Vincent Mazaitis/AA/USEPA/US@EPA Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>, Jim Snyder/AA/USEPA/US@EPA Date: 05/10/2012 02:21 PM Subject: Audi test results</michael.giles@vw.com></william.rodgers@vw.com>
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Emissions Certification Engineer
VOLKSWAGEN Group of America, Inc.
3

Engineering and Environmental Office 3800 Hamlin Rd.

Auburn Hills, MI 48436

**United States** 

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

```
To:
          "Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; 'Bill Pagels'"
       [bill.pagels@meidenamerica.com]; 'Bob Maxwell'" [remaxwell@comcast.net]; hris
Nevers/AA/USEPA/US@EPA;"'Dave Kosmalski"
                                                    [david.kosmalski@gm.com]; 'Dave
               [david.kosmalski@gm.com]; 'Dennis Pawlak'"
Kosmalski'"
                                                            [Dennis.Pawlak@na.mitsubishi-
motors.coml; 'Douglas Reid'"
                             [Douglas.Reid@na.mitsubishi-motors.com]; 'Duoba, Mike'"
[mduoba@anl.gov]; 'Jeff Foor'" [jdf14@chrysler.com]; 'Jim Smith'" [james.smith@chrysler.com];
im Snyder/AA/USEPA/US@EPA;"'Keith Thompson'"
                                                    [Keith.Thompson@bepco.com]; 'Keith
Thompson"
              [Keith.Thompson@bepco.com]; 'Kent Theil'" [okt@chrysler.com];
'kyle.bedsole@gm.com'" [kyle.bedsole@gm.com]; 'Mahmoud Yassine'" [mky@chrysler.com];
'Marc Belzile" [marc.a.belzile@tc.gc.ca]; 'mark paxton'" [mpaxton@ganassi.com];
'MBrussow@sae.org" ['MBrussow@sae.org']; 'Meyer, Norm'" [norm.meyer@tc.gc.ca]; Okawa,
Naoyasu (N.)" [okawa.n@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov"
['Paulina.Carl@epamail.epa.gov']; Peabody, Jason (J.A.)" [jpeabod6@ford.com]; ete Janosi
[petejanosi@yahoo.com]; Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com];
'takashi a fujiwara@ahm.honda.com'" [takashi a fujiwara@ahm.honda.com]; iffany Jackson
[JacksT2@nrd.nissan-usa.com]; homas
Schrodt/AA/USEPA/US@EPA;"'tom.beierschmitt@tema.toyota.com'"
       ['tom.beierschmitt@tema.toyota.com']; 'tom.beierschmitt@tema.toyota.com'"
       ['tom.beierschmitt@tema.toyota.com']; 'tommy_chang@ahm.honda.com'"
       ['tommy_chang@ahm.honda.com']; 'William Meschievitz'"
       [william.meschievitz@tema.toyota.com]; 'Khan, Farrukh'"
                                                                   [KhanF@NRD.NISSAN-
USA.COM]
```

Cc: Carl Paulina/AA/USEPA/US@EPA[]

From: "Glodich, Jeffrey (J.M.)"

Sent: Mon 5/14/2012 4:40:56 PM

Subject: RE: J2951 Phase II Review https://www.connectmeeting.att.com

Hi all,

We are scheduled to have a J2951 meeting this Thursday. Since we are trying to wrap-up J1634 this month, it might make sense to cancel this meeting and focus on the J1634 ballot prep. Please let me know if you have any issues that need to be discussed this month, otherwise we'll cancel and reconvene in June.

Thanks, Jeff

-----Original Appointment-----From: Glodich, Jeffrey (J.M.) Sent: Friday, January 20, 2012 1:11 PM

To: Glodich, Jeffrey (J.M.); Beierschmitt, Thomas (T.A.); 'Bill Pagels'; 'Bob Maxwell'; 'chris nevers'; 'Dave Kosmalski'; 'Dennis Pawlak'; 'Douglas Reid'; 'Duoba, Mike'; 'Jeff Foor'; 'Jim Smith'; 'Jim Snyder'; 'Keith Thompson'; 'Kent Theil'; 'kyle.bedsole@gm.com'; 'Mahmoud Yassine'; 'Marc Belzile'; 'mark paxton'; 'MBrussow@sae.org'; 'Meyer, Norm'; Okawa, Naoyasu (N.); 'Paulina.Carl@epamail.epa.gov'; Peabody, Jason (J.A.); Pete Janosi; Suanne.Thomas@vw.com; 'takashi\_a\_fujiwara@ahm.honda.com'; Tiffany Jackson; 'Tom Schrodt'; 'tom.beierschmitt@tema.toyota.com'; 'tommy\_chang@ahm.honda.com'; 'William Meschievitz'; Khan, Farrukh

Cc: Carl Paulina

Subject: J2951 Phase II Review

When: Thursday, May 17, 2012 1:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Toyota, Ann Arbor

## Purpose:

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

Meeting Info:

**Ex.** 6

Web Address https://www.connectmeeting.att.com

**To:** "Glodich, Jeffrey (J.M.)" [jglodich@ford.com]

"'MBrussow@sae.org'" ['MBrussow@sae.org']; 'Paulina.Carl@epamail.epa.gov'" Cc: ['Paulina.Carl@epamail.epa.gov']; 'tommy\_chang@ahm.honda.com'" ['tommy chang@ahm.honda.com']; 'tom.beierschmitt@tema.toyota.com'" ['tom.beierschmitt@tema.toyota.com']; 'Bill Pagels'" [bill.pagels@meidenamerica.com]; 'Dave Kosmalski''' [david.kosmalski@gm.com]; 'Douglas Reid''' [Douglas.Reid@na.mitsubishimotors.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; 'Jim Smith" [james.smith@chrysler.com]; 'Jeff Foor'" [jdf14@chrysler.com]; Peabody, Jason (J.A.)" [ipeabod6@ford.com]; 'Keith Thompson'" [Keith.Thompson@bepco.com]; 'Khan, Farrukh'" [KhanF@NRD.NISSAN-USA.COM]; 'kyle.bedsole@gm.com'" [kyle.bedsole@gm.com]; 'Marc Belzile" [marc.a.belzile@tc.gc.ca]; 'Duoba, Mike" [mduoba@anl.gov]; 'Mahmoud Yassine" [mky@chrysler.com]; 'mark paxton'" [mpaxton@ganassi.com]; hris Nevers/AA/USEPA/US@EPA;"'Meyer, Norm" [norm.meyer@tc.gc.ca]; 'Meyer, Norm'" [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.)" [okawa.n@mazda.co.ip]; 'Kent Theil'" [okt@chrvsler.com]; arl Paulina/AA/USEPA/US@EPA;Pete Janosi [peteianosi@yahoo.com]; ete Janosi [petejanosi@yahoo.com]; 'Bob Maxwell'" [remaxwell@comcast.net]; homas Schrodt/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA;"Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com]; im Snyder/AA/USEPA/US@EPA;"Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com]; Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com]; 'takashi\_a\_fujiwara@ahm.honda.com'" [takashi\_a\_fujiwara@ahm.honda.com]; Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; 'William Meschievitz"

[william.meschievitz@tema.toyota.com]

From: "Dennis Pawlak"

Sent: Mon 5/14/2012 5:21:03 PM
Subject: RE: J2951 Phase II Review
https://www.connectmeeting.att.com

I'm fine with June.

Best Regards,

Dennis M. Pawlak Manager, Vehicle Verification Mitsubishi Motors R&D of America, Inc. dennis.pawlak@na.mitsubishi-motors.com Office: 734-477-6146 fax: 734-971-0901

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\*

From: "Glodich, Jeffrey (J.M.)" <jglodich@ford.com>
To: "Beierschmitt, Thomas (T.A.)" <tbeiers1@ford.com>, "'Bill Pagels'"

<bill.pagels@meidenamerica.com>, "'Bob Maxwell'" <remaxwell@comcast.net>, "'chris nevers'"
<nevers.chris@epa.gov>, "'Dave Kosmalski'" <david.kosmalski@gm.com>, "'Dennis Pawlak'"

<Dennis.Pawlak@na.mitsubishi-motors.com>, "'Douglas Reid'" <Douglas.Reid@na.mitsubishi-motors.com>, "'Duoba, Mike'" <mduoba@anl.gov>, "'Jeff Foor'" <jdf14@chrysler.com>, "'Jim Smith'" <james.smith@chrysler.com>, "'Jim Snyder'" <snyder.jim@epa.gov>, "'Keith Thompson'" <Keith.Thompson@bepco.com>, "'Kent Theil'" <okt@chrysler.com>, "'kyle.bedsole@gm.com'" <kyle.bedsole@gm.com>, "'Mahmoud Yassine'" <mky@chrysler.com>, "'Marc Belzile'" <marc.a.belzile@tc.gc.ca>, "'mark paxton'" <mpaxton@ganassi.com>, "'MBrussow@sae.org'" <'MBrussow@sae.org'>, "'Meyer, Norm'" <norm.meyer@tc.gc.ca>, "Okawa, Naoyasu (N.)" <okawa.n@mazda.co.jp>, "'Paulina.Carl@epamail.epa.gov'" <'Paulina.Carl@epamail.epa.gov'>, "Peabody, Jason (J.A.)" < jpeabod6@ford.com>, Pete Janosi <petejanosi@yahoo.com>, "Suanne.Thomas@vw.com" <Suanne.Thomas@vw.com>, "'takashi\_a\_fujiwara@ahm.honda.com'" <takashi\_a\_fujiwara@ahm.honda.com>, Tiffany Jackson <JacksT2@nrd.nissan-usa.com>, "'Tom Schrodt'" <Schrodt.Thomas@epamail.epa.gov>, "'tom.beierschmitt@tema.toyota.com'" < 'tom.beierschmitt@tema.toyota.com'>, "'tommy\_chang@ahm.honda.com'" <'tommy\_chang@ahm.honda.com'>, "'William Meschievitz'" <william.meschievitz@tema.toyota.com>, "'Khan, Farrukh'" <KhanF@NRD.NISSAN-USA.COM> "'Carl Paulina'" <Paulina.Carl@epamail.epa.gov>

Date: 05/14/2012 12:40 PM Subject: RE: J2951 Phase II Review

Hi all,

We are scheduled to have a J2951 meeting this Thursday. Since we are trying to wrap-up J1634 this month, it might make sense to cancel this meeting and focus on the J1634 ballot prep. Please let me know if you have any issues that need to be discussed this month, otherwise we'll cancel and reconvene in June.

Thanks, Jeff

-----Original Appointment-----From: Glodich, Jeffrey (J.M.)

Sent: Friday, January 20, 2012 1:11 PM

To: Glodich, Jeffrey (J.M.); Beierschmitt, Thomas (T.A.); 'Bill Pagels'; 'Bob Maxwell'; 'chris nevers'; 'Dave Kosmalski'; 'Dennis Pawlak'; 'Douglas Reid'; 'Duoba, Mike'; 'Jeff Foor'; 'Jim Smith'; 'Jim Snyder'; 'Keith Thompson'; 'Kent Theil'; 'kyle.bedsole@gm.com'; 'Mahmoud Yassine'; 'Marc Belzile'; 'mark paxton'; 'MBrussow@sae.org'; 'Meyer, Norm'; Okawa, Naoyasu (N.); 'Paulina.Carl@epamail.epa.gov'; Peabody, Jason (J.A.); Pete Janosi; Suanne.Thomas@vw.com; 'takashi\_a\_fujiwara@ahm.honda.com'; Tiffany Jackson; 'Tom Schrodt'; 'tom.beierschmitt@tema.toyota.com'; 'tommy\_chang@ahm.honda.com'; 'William Meschievitz'; Khan, Farrukh Cc: Carl Paulina

Subject: J2951 Phase II Review

When: Thursday, May 17, 2012 1:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Toyota, Ann Arbor

## Purpose:

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

Meeting Info:

Ex. 6

Web Address https://www.connectmeeting.att.com

To: "Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; 'Bill Pagels'" [bill.pagels@meidenamerica.com]; 'Bob Maxwell'" [remaxwell@comcast.net]; hris Nevers/AA/USEPA/US@EPA;"'Dave Kosmalski'" [david.kosmalski@gm.com]; 'Dave [david.kosmalski@gm.com]; 'Dennis Pawlak'" Kosmalski'" [Dennis.Pawlak@na.mitsubishi-[Douglas.Reid@na.mitsubishi-motors.com]; 'Duoba, Mike'" motors.com]; 'Douglas Reid'" [mduoba@anl.gov]; 'Jeff Foor'" [jdf14@chrysler.com]; 'Jim Smith'" [james.smith@chrysler.com]; im Snyder/AA/USEPA/US@EPA;"'Keith Thompson'" [Keith.Thompson@bepco.com]; 'Keith Thompson'" [Keith.Thompson@bepco.com]; 'Kent Theil'" [okt@chrysler.com]; 'kyle.bedsole@gm.com'" [kyle.bedsole@gm.com]; 'Mahmoud Yassine'" [mky@chrysler.com]; 'Marc Belzile'" [marc.a.belzile@tc.gc.ca]; 'mark paxton'" [mpaxton@ganassi.com]; 'MBrussow@sae.org" ['MBrussow@sae.org']; 'Meyer, Norm'" [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.)" [okawa.n@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov" ['Paulina.Carl@epamail.epa.gov']; Peabody, Jason (J.A.)" [jpeabod6@ford.com]; ete Janosi [petejanosi@yahoo.com]; Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com]; 'takashi a fujiwara@ahm.honda.com'" [takashi a fujiwara@ahm.honda.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; homas Schrodt/AA/USEPA/US@EPA;"'tom.beierschmitt@tema.toyota.com'" ['tom.beierschmitt@tema.toyota.com']; 'tom.beierschmitt@tema.toyota.com'" ['tom.beierschmitt@tema.toyota.com']; 'tommy\_chang@ahm.honda.com'" ['tommy\_chang@ahm.honda.com']; 'William Meschievitz'" [william.meschievitz@tema.toyota.com]; 'Khan, Farrukh'" [KhanF@NRD.NISSAN-

USA.COM]

Cc: Carl Paulina/AA/USEPA/US@EPA[]

From: "Glodich, Jeffrey (J.M.)"

Sent: Tue 5/15/2012 11:23:29 AM

Subject: Cancelled: J2951 Phase II Review

Meeting canceled for this month.

#### Purpose:

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

Meeting Info:

**Ex.** 6

Web Address https://www.connectmeeting.att.com<a href="https://www.connectmeeting.att.com/">https://www.connectmeeting.att.com</a>

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com] From: "Giles, Michael (EEO)" Wed 5/16/2012 1:54:20 PM Sent: Subject: VW Group - Decision Information for 3.0L TDI Hello Jim, We just submitted 2 Decision Information requests for the following related vehicles: VehicleID Configuration Model **Test Group** DADXT03.03UG D3UG-TAQ Audi Q7 DADXT03.02UG D3UG-TAQ 1 Volkswagen Touareg Note, both of these vehicles are the EDV for their test groups. While the test group and models are carryover, these vehicles represent a new generation for the engine with updated hardware and software. Please contact me if you have any questions. Regards, Mike Michael Giles **Certification Specialist Engineering and Environmental Office** 

3800 Hamlin Road

Auburn Hills, MI 48326

Volkswagen Group of America, Inc.

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"
Sent: Wed 5/16/2012 8:26:55 PM

Subject: RE: VW Group - Decision Information for 3.0L TDI

snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

Hi Jim,

You are correct, the heavier Q7 is tighter against the Touareg standard. That is the reason for the split since MY 2011.

Regards,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, May 16, 2012 3:58 PM

To: Giles, Michael (EEO)

Subject: Re: VW Group - Decision Information for 3.0L TDI

Why are they separate test groups if they are the same test vehicle? Is the SFTP composite marginal on the heavy one?

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" < William.Rodgers@vw.com>

Date: 05/16/2012 09:54 AM

Subject: VW Group - Decision Information for 3.0L TDI

### Hello Jim,

We just submitted 2 Decision Information requests for the following related vehicles:

Test Group VehicleID Configuration Model
DADXT03.03UG D3UG-TAQ 0 Audi Q7

DADXT03.02UG D3UG-TAQ 1 Volkswagen Touareg

Note, both of these vehicles are the EDV for their test groups. While the test group and models are carryover, these vehicles represent a new generation for the engine with updated hardware and software. Please contact me if you have any questions.

Regards,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William (EEO)"
Sent: Thur 5/17/2012 11:08:06 AM
Subject: RE: Bentley Mulsanne

snyder.jim@epa.gov William.Rodgers@vw.com snyder.jim@epa.gov

Jim,

There will be one configuration (#6500 only) for the Mulsanne. This means using substitute data from the previous model year which had different ETW/RLHP. Only one set test of data will represent the entire test group for emissions and fuel economy.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, May 16, 2012 5:14 PM

To: Jim Snyder

Cc: Rodgers, William (EEO) Subject: Re: Bentley Mulsanne

Bill, was this primarily for EDV or was B hoping to carryover Fuel economy too? I can consider EDV carryover but I think it will be hard to not have a new configuration for FEDV.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US

To: "Rodgers, William" < William.Rodgers@vw.com>

Date: 05/16/2012 05:04 PM Subject: Bentley Mulsanne

Bill, I was checking the CFR and a coworker pointed to a more recent section with regard to test vehicle selection. 86.1828-01 is more general in the criteria for worse case. Part e and f of 1828 along with 86.1839-01 (carryover) allow for criteria beyond test weight/RLHP/NV to determine worse case.

Bentley needs to submit data explaining why they think the previous configuration is worse for emission than the new one. Emissions data or catalyst temperature comparisons are best but see what they have.

Jim Snyder Light-Duty Vehicle Group Compliance Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William (EEO)"

Sent: Thur 5/17/2012 11:37:18 AM

Subject: RE: Bentley Mulsanne

snyder.jim@epa.gov William.Rodgers@vw.com snyder.jim@epa.gov

Jim,

I just spoke to Bentley. I think I was successful in persuading them to just present a complete set of new test data instead of burning up valuable hours trying to justifying the comparability of the two vehicles.

Thanks for your help.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, May 16, 2012 5:14 PM

To: Jim Snyder

Cc: Rodgers, William (EEO) Subject: Re: Bentley Mulsanne

Bill, was this primarily for EDV or was B hoping to carryover Fuel economy too? I can consider EDV carryover but I think it will be hard to not have a new configuration for FEDV.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US

To: "Rodgers, William" < William.Rodgers@vw.com>

Date: 05/16/2012 05:04 PM Subject: Bentley Mulsanne

Bill, I was checking the CFR and a coworker pointed to a more recent section with regard to test vehicle selection. 86.1828-01 is more general in the criteria for worse case. Part e and f of 1828 along with 86.1839-01 (carryover) allow for criteria beyond test weight/RLHP/NV to determine worse case. Bentley needs to submit data explaining why they think the previous configuration is worse for emission

than the new one. Emissions data or catalyst temperature comparisons are best but see what they have.

Jim Snyder Light-Duty Vehicle Group Compliance Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

Jim Snyder/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; inc Wehrly/AA/USEPA/US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com] Cc: "Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de] From: "Kata, Leonard (EEO)" Sent: Thur 5/17/2012 8:54:44 PM Subject: VW and EPA Meeting - MPI/FSI Fuel Injection System When: Wednesday, May 30, 2012 8:00 AM-9:00 AM (GMT-05:00) Eastern Time (US & Canada). Where: Online Meeting Note: The GMT offset above does not reflect daylight saving time adjustments. \*~\*~\*~\*~\*~\* To all: I have scheduled an online meeting to discuss the Volkswagen Group MPI/FSI Fuel Injection System. If this time is not acceptable or you cannot join this meeting through the internet connection provided, please let me know. Jim and Linc: If there are others at EPA that you wish to include, please let me know, and I will send out a revised invitation. Best regards, Len Leonard W. Kata Manager, Emission Regulations and Certification **Engineering and Environmental Office** Volkswagen Group of America, Inc. Phone: (248) 754-4204 Cell: (248) 797-3886 E-Mail: leonard.kata@vw.com<mailto:leonard.kata@vw.com> **Ex.** 6 Join by Phone Find a local number<a href="https://dialin.vw.com">https://dialin.vw.com</a> Ex. 6

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Kata, Leonard (EEO)"
Sent: Thur 5/17/2012 9:16:29 PM

Subject: RE: VW and EPA Meeting - MPI/FSI Fuel Injection System

Thanks, will do.

Len

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, May 17, 2012 5:15 PM

To: Kata, Leonard (EEO)

Cc: Joel Ball; Joel Dalton; Linc Wehrly; Stephen Healy; Chris Nevers; DavidA Wright; William Ott

Subject: VW and EPA Meeting - MPI/FSI Fuel Injection System

Len, Please add the above people to your mtg invitation in case they are interested.

This is a web mtg with Germany on their upcoming multipoint/direct injection fuel system on May 30 at 8am.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

To: Jim Snyder/AA/USEPA/US@EPA[] From: "Kata, Leonard (EEO)" Sent: Thur 5/17/2012 9:22:56 PM Cancelled: VW and EPA Meeting - MPI/FSI Fuel Injection System Subject: When: Wednesday, May 30, 2012 8:00 AM-9:00 AM (GMT-05:00) Eastern Time (US & Canada). Where: Online Meeting Note: The GMT offset above does not reflect daylight saving time adjustments. \*~\*~\*~\*~\*~\* To all: I have scheduled an online meeting to discuss the Volkswagen Group MPI/FSI Fuel Injection System. If this time is not acceptable or you cannot join this meeting through the internet connection provided, please let me know. Jim: I have added the names that you mentioned. Best regards, Len Leonard W. Kata Manager, Emission Regulations and Certification **Engineering and Environmental Office** Volkswagen Group of America, Inc. Phone: (248) 754-4204 Cell: (248) 797-3886 E-Mail: leonard.kata@vw.com<mailto:leonard.kata@vw.com> Ex. 6 Join by Phone Ex. 6 Find a local number<a href="https://dialin.vw.com">https://dialin.vw.com</a>

1

το: Ex. 7

Wehrly/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;William Nevers/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;William Nevers/AA/USEPA/US@EPA;William 
Ott/AA/USEPA/US@EPA[]; avidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA[]; illiam Ott/AA/USEPA/US@EPA[]

Cc: Ex. 7

From: Ex. 7
Sent: Thur 5/17/2012 9:22:56 PM

**Subject:** Rescheduled: VW and EPA Meeting - MPI/FSI Fuel Injection System (May 30 08:00 AM EDT in Online Meeting)

When: Wednesday, May 30, 2012 8:00 AM-9:00 AM (GMT-05:00) Eastern Time (US & Canada).

Where: Online Meeting

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*

To all:

I have scheduled an online meeting to discuss the Volkswagen Group MPI/FSI Fuel Injection System. If this time is not acceptable or you cannot join this meeting through the internet connection provided, please let me know.

Ex. 7

I have added the names that you mentioned.

Best regards,

Ex. 7

Ex. 7

Ex. 7	
EX. /	
Join by Phone	
Ex. 7	
Find a local number <https: dialin.vw.com=""></https:>	
Ex. 7	
Forgot your dial-in PIN? <https: dialin.vw.com="">   First online</https:>	
meeting <b>Fx 7</b>	
, 58 blduod	
Fy 7	

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Fri 5/18/2012 3:23:18 PM

Subject: VW Group - Certificate Request DVWXV02.0U4S (2.0I TDI-SCR)

william.rodgers@vw.com

Hi Jim,

I submitted a Certificate Request for the 2013 VW Passat 2.0L TDI-SCR, test group DVWXV02.0U4S. This is a carryover from 2012 with no changes.

Thanks,

**Bill Rodgers** 

**Emissions Certification Engineer** 

VOLKSWAGEN Group of America, Inc. Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

**United States** 

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

To: David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[] Linc Wehrly/AA/USEPA/US@EPA;"Kata, Leonard (EEO)" Cc: [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com] From: "Thomas, Richard (EEO)" Sent: Mon 5/21/2012 1:02:41 PM Subject: Testing Strategy Approval Request - Audi Start/Stop Systems Richard.Thomas@VW.com Hello Dave; After our visit with the demonstration 4.0L V8 Audi A8 on May 8th and equipped with cylinder deactivation and start/stop strategy, we reviewed our testing strategy and have the following request. The 3.0L V6 engine equipped Audi A8 emission data vehicle tested on May 2nd and May 8th at the EPA facility, was tested in two configurations. That is: complete five cycle tests with start/stop active and a complete second set of tests with start/stop system inactive at our facility in Ingolstadt . EPA confirmed the city tests in both configurations, start/stop active and inactive. Under the start/stop enable conditions you saw during the presentation, it is clear that the engine does not stop during three of the 5cycle tests. There is no engine shut down in Highway, SC03 and Cold CO test cycles and only marginal engine stop in the US06 test cycle. The current start/stop strategy would yield on minor fuel economy improvement in the FTP and US06 cycle and therefore we would prefer to test only the FTP and US06 harmonically average the two sets of test configurations together at the 50/50 rate. The high cost testing burden at our facility would be lessened and testing capacity could improve. Until which time there are some operational start/stop system strategy changes, we would propose to test only the FTP and US06 with start/stop active and inactive and average these tests at the 50/50 rate. If you have any questions, please contact me directly.

Richard E. Thomas VOLKSWAGEN Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO)

Best regards,

Richard

Phone: 248 754-4213 Fax: 248 754-4207

Richard.Thomas@VW.com

To: Cc: From:	Verify Help Desk [verifyhelp@csc.com]; im Snyder/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com] "Giles, Michael (EEO)"
Sent: Subject:	Mon 5/21/2012 7:08:40 PM VW Group - Error on Request for Certificate
Hello,	
I received DNLXV06.	the below error when submitting a request for certificate for Lamborghini Test Group 5L83.
	confirmed that we submitted information related to this test group both in our preliminary GHG in the Certification preview meeting.
Also, the a	pplication document was received into VERIFY with email confirmation prior to this error.
Please adv	ilea
Please auv	ise.
Regards	
Mike	
Transactio	n: _79e19103-1dbf-445c-9a41-0271990accc6
Transactio	n Status Details
	n Status Identifier : REJECTED
	n Message Text : LD-CERT-CR-BR027 - If GHG Pre-Model Year Report Indicator (CR-22) is 'Y' an LD-GHG Pre-Model Year Report must have been submitted for this Model Year (CR-3).
Michael G	iles

1

**Certification Specialist** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

**From:** "Giles, Michael (EEO)" **Sent:** Tue 5/22/2012 1:13:30 PM

Subject: FW: VW Group - Error on Request for Certificate (HLP-2589)

Hello Jim,

We have submitted the application for Lamborghini but are having strange issues with VERIFY related to submitting a request for certificate.

In the meantime if you can let me know if you have any questions about this, please let me know.

This is a carryover test group with same Exhaust and Evaporative tests, but the exhaust uses the new EPA assigned additive DF's. Also, we are adding two stop/start configurations for MY 2013 (in addition to the two existing non-stop/start configurations).

Thanks, Mike

-----Original Message-----From: Giles, Michael (EEO)

Sent: Tuesday, May 22, 2012 8:40 AM

To: 'Verify Help Desk'

Cc: Harris, Dale; Rodgers, William

Subject: RE: VW Group - Error on Request for Certificate (HLP-2589)

Hello Ex. 6

The GHG report was already submitted through Mfr. VWX. To confirm this, see attached error message when we tried to re-submit the file through NLX.

Why doesn't the system accept our "Y" answer that the GHG report was submitted, as it did in the past? It appears that this field is broken or has become non-functional, whereas it would be the best solution for us with multiple Mfr codes.

Can you help point us in the right direction here as we need to understand the process changes.

Thanks, Mike

#### 

Submission rejected for your file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf - Message

From: Verify Administrator

Subject: Submission rejected for your file upload CBI DVWXV COMMON CR1A CAR R03.pdf

Date: Tue 5/22/2012 8:06 AM

Your recent submission for the file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf has been received by EPA. The following errors in your submission prevented it from being accepted by EPA. Validation Error(s):

Verify help desk ticket HLP-2589 was opened for your inquiry.

I've verified that two documents were uploaded for NLX today; however, the Compliance Document Type associated with both documents is 'APPLICATION FOR CERTIFICATION.'

I do not see a document in the system for NLX associated with Compliance Document Type: LD-GHG Pre-model Year Report.

Please upload this report using this Compliance Document Type (see highlighted blue selection in screen shot). After you have uploaded this report and associated it with this document type please try your certificate request submission again and let me know if it is accepted.

(Embedded image moved to file: pic06422.gif)

Ex. 6

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Giles, Michael (EEO)"

<michael.giles@vw To

.com> Verify Help Desk@CSC, "Jim Snyder

(Snyder.Jim@epamail.epa.gov)"

05/21/2012 03:08 <Snyder.Jim@epamail.epa.gov>

PM

"Rodgers, William (EEO)" <William.Rodgers@vw.com>

Subject

VW Group - Error on Request for

Certificate

Hello,

I received the below error when submitting a request for certificate for Lamborghini Test Group DNLXV06.5L83. Note, we confirmed that we submitted information related to this test group both in our preliminary GHG report and in the Certification preview meeting.

Also, the application document was received into VERIFY with email confirmation prior to this error.

Please advise.

Regards Mike

Transaction: \_79e19103-1dbf-445c-9a41-0271990accc6

**Transaction Status Details** 

Transaction Status Identifier: REJECTED Transaction Message Text: LD-CERT-CR-BR027 - If GHG Pre-Model Year Report Indicator (CR-22) is 'Y' (Yes), then an LD-GHG Pre-Model Year Report must have been submitted for this Model Year (CR-3).

Michael Giles Certification Specialist Engineering and Environmental Office Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 United States of America Phone +1-248-754-4229 FAX +1-248-754-4207

**From:** "Giles, Michael (EEO)" **Sent:** Tue 5/22/2012 7:05:35 PM

Subject: RE: VW Group - Error on Request for Certificate (HLP-2589)

Hello Jim,

It looks like I did manage to get the certificate request through. Can you confirm it made it to your side?

Thanks, Mike

-----Original Message-----From: Giles, Michael (EEO)

Sent: Tuesday, May 22, 2012 9:14 AM

To: Jim Snyder (Snyder.Jim@epamail.epa.gov)

Subject: FW: VW Group - Error on Request for Certificate (HLP-2589)

Hello Jim,

We have submitted the application for Lamborghini but are having strange issues with VERIFY related to submitting a request for certificate.

In the meantime if you can let me know if you have any questions about this, please let me know.

This is a carryover test group with same Exhaust and Evaporative tests, but the exhaust uses the new EPA assigned additive DF's. Also, we are adding two stop/start configurations for MY 2013 (in addition to the two existing non-stop/start configurations).

Thanks, Mike

----Original Message-----From: Giles, Michael (EEO)

Sent: Tuesday, May 22, 2012 8:40 AM

To: 'Verify Help Desk'

Cc: Harris, Dale; Rodgers, William

Subject: RE: VW Group - Error on Request for Certificate (HLP-2589)

Hello Vincent,

The GHG report was already submitted through Mfr. VWX. To confirm this, see attached error message when we tried to re-submit the file through NLX.

Why doesn't the system accept our "Y" answer that the GHG report was submitted, as it did in the past? It appears that this field is broken or has become non-functional, whereas it would be the best solution for us with multiple Mfr codes.

Can you help point us in the right direction here as we need to understand the process changes.

Thanks,

Mike

#### 

Submission rejected for your file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf - Message

From: Verify Administrator

Subject: Submission rejected for your file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf

Date: Tue 5/22/2012 8:06 AM

Your recent submission for the file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf has been received by EPA. The following errors in your submission prevented it from being accepted by EPA. Validation Error(s):

- DOC-BR14 - The document file name 'CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf' already exists in the Verify system.

The following document identifier has been assigned to this request: \_b101c00d-c6ea-43c9-a776-bbd8b441f6aa

Document Name: CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf Transaction Identifier: \_b101c00d-c6ea-43c9-a776-bbd8b441f6aa

Click here to view the status history.

Thank you for submitting your request to Verify via CDX.

----Original Message-----

From: Vincent E Coleman [mailto:vcoleman2@csc.com] On Behalf Of Verify Help Desk

Sent: Monday, May 21, 2012 5:51 PM

To: Giles, Michael (EEO)

Subject: Re: VW Group - Error on Request for Certificate (HLP-2589)

Hello Mr. Giles,

Verify help desk ticket HLP-2589 was opened for your inquiry.

I've verified that two documents were uploaded for NLX today; however, the Compliance Document Type associated with both documents is 'APPLICATION FOR CERTIFICATION.'

I do not see a document in the system for NLX associated with Compliance Document Type: LD-GHG Pre-model Year Report.

Please upload this report using this Compliance Document Type (see highlighted blue selection in screen shot). After you have uploaded this report and associated it with this document type please try your certificate request submission again and let me know if it is accepted.

(Embedded image moved to file: pic06422.gif)

Vincent

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

Hello,

I received the below error when submitting a request for certificate for Lamborghini Test Group DNLXV06.5L83. Note, we confirmed that we submitted information related to this test group both in our preliminary GHG report and in the Certification preview meeting.

Also, the application document was received into VERIFY with email confirmation prior to this error.

Please advise.

Regards Mike

Transaction: \_79e19103-1dbf-445c-9a41-0271990accc6

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## **Transaction Status Details**

Transaction Status Identifier: REJECTED Transaction Message Text: LD-CERT-CR-BR027 - If GHG Pre-Model Year Report Indicator (CR-22) is 'Y' (Yes), then an LD-GHG Pre-Model Year Report must have been submitted for this Model Year (CR-3).

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

From: "Rodgers, William (EEO)"
Sent: Thur 5/24/2012 2:42:49 PM
Subject: VW Group Certification Requests

Hi Jim,

I have uploaded two Certification Requests and the associated Applications today for the following carryover test groups.

DVWXT03.6U76 – VW Touareg VR6

DVWXV06.3UA8 - Audi A8L W12 (VW test group)

Regards,

**Bill Rodgers** 

To: Robert Peavyhouse/AA/USEPA/US@EPA[]

Cc: David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im

Snyder/AA/USEPA/US@EPA[]

From: "Thomas, Richard (EEO)"

Sent: Tue 5/29/2012 2:29:13 PM

Subject: Audi Test Group - Lamborghini Gallardo Models

Richard.Thomas@VW.com

Hello Bob;

I need your input in order to label 2013 Lamborghini Gallardo models that are contained in a 2013 Audi Test group. I attempted to enter index # 030 signed on as NLX (Lamborghini) and received the following error messages from Verify;

Transaction Status Details

Transaction Status Identifier: REJECTED

Transaction Message Text: LD-FE-GL-BR202 - If the Manufacturer Code of the owner of the Representative Test Group (GL-13.5) is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the Test Group. (Test Group = DADXV05.2LR8)

Transaction Message Text: LD-FE-GL-BR003 - The Submitter's Manufacturer Code (in Submission Author Details) must match the Carline Manufacturer Code (GL-10).

Transaction Message Text: LD-FE-GL-BR154 - Test Groups listed in the Unique Carline/Subconfiguration Test Groups (GL-207) must have one Certified Model Carline the same as the Carline of the Model Type for this FE Label. (Subconfiguration Test Group = DADXV05.2LR8)

There is a work around for BR154 that I don't want to use now, because I can wait till after the next release 10 deployment on June 1.

Previously we removed a couple of error messages by allowing Audi to use Lamborghini as an alternate manufacture by test group and carline. We have only two carlines 406 Gallardo Coupe and 426 Gallardo Spyder created as Audi division 3 in test group DADXV05.2LR8. I know you mentioned to me that we should not create more than one carline for a model name.

In an attempt to remove BR202 and BR003 we tried to sign on as Lamborghini and allow Audi as an alternative manufacture but got error processing messages: BR8, BR11, and BR10.

If you can tell me what the latest thinking is regarding the Volkswagen Group situation and manufacture

codes, carline and division numbers, I would appreciate it. Perhaps I should enter this as an Audi label and error BR003 will go away. If you feel that the Verify help people are up to speed and should handle this problem, please let me know and I will direct this to them.

Best regards,

Richard E. Thomas VOLKSWAGEN Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO) Phone: 248 754-4213

Fax: 248 754-4217

Richard.Thomas@VW.com

To: "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Peter, Juergen (EASZ/1)"

[juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)"

[Lothar.Rech@AUDI.DE]; Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de];

Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; Schmidt, Oliver (EEO)"

[Oliver.Schmidt@vw.com]; inc Wehrly/AA/USEPA/US@EPA;Jim

Snyder/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel

Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris

Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William

Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)"

[extern.hannah.helena.schlueter@volkswagen.de]; im Snyder/AA/USEPA/US@EPA;Joel

Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen

Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA

Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN:

IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; oel Ball/AA/USEPA/US@EPA;Joel

Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris

Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William

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Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris

Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William

Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)"

[extern.hannah.helena.schlueter@volkswagen.de]; tephen

Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; DavidA

Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN:

IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; hris

Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William

Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)"

[extern.hannah.helena.schlueter@volkswagen.de]; avidA

Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN:

IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; illiam

Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)"

[extern.hannah.helena.schlueter@volkswagen.de]; Schlueter, Hannah (EXTERN: IAV)"

[extern.hannah.helena.schlueter@volkswagen.de]; Stendel, Detlef (EASZ/1)"

[detlef.stendel@volkswagen.de]

Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Giles, Michael (EEO)"

[michael.giles@vw.com]

From: "Kata, Leonard (EEO)"
Sent: Wed 5/30/2012 12:39:02 PM

Subject: RE: VW and EPA Meeting - MPI/FSI Fuel Injection System

Hello all:

Unfortunately, not all participants were able to join the originally scheduled conference call and it was rescheduled for 0900 Detroit time today. I have a meeting conflict at 0900 that I thought I could change, but this is not possible. Therefore, we need to reschedule this conference call/web conference for later today. 1000 or later would be preferable.

Please let me know if this is possible.

Best regards,		
Len		

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

From: Kata, Leonard (EEO)

Sent: Wednesday, May 30, 2012 8:16 AM

To: Kata, Leonard (EEO); Peter, Juergen (EASZ/1); Rech, Lothar (I/EA-523); Dorer, Frank, Dr. (EAES/3); Vieser, Steffen (I/EA-83); Schmidt, Oliver (EEO); 'Wehrly.Linc@epamail.epa.gov'; 'Jim Snyder'; 'Ball.Joel@epamail.epa.gov'; 'Dalton.Joel@epamail.epa.gov'; 'Healy.Stephen@epamail.epa.gov'; 'Nevers.Chris@epamail.epa.gov';

'Wright.DavidA@epamail.epa.gov'; 'Ott.William@epamail.epa.gov'; Schlueter, Hannah (EXTERN: IAV); Stendel,

Detlef (EASZ/1)

Cc: Rodgers, William (EEO); Giles, Michael (EEO)

Subject: RE: VW and EPA Meeting - MPI/FSI Fuel Injection System

From: Kata, Leonard (EEO)

Sent: Tuesday, May 29, 2012 10:03 AM

To: Peter, Juergen (EASZ/1); Rech, Lothar (I/EA-523); Dorer, Frank, Dr. (EAES/3); Vieser, Steffen (I/EA-83); Schmidt,

Oliver (EEO); Wehrly.Linc@epamail.epa.gov; 'Jim Snyder'; Ball.Joel@epamail.epa.gov;

'Dalton.Joel@epamail.epa.gov'; Healy.Stephen@epamail.epa.gov; Nevers.Chris@epamail.epa.gov;

'Wright.DavidA@epamail.epa.gov'; 'Ott.William@epamail.epa.gov'; Schlueter, Hannah (EXTERN: IAV); Stendel,

Detlef (EASZ/1)

Cc: Rodgers, William (EEO); Giles, Michael (EEO) Subject: VW and EPA Meeting - MPI/FSI Fuel Injection System
To all:
Tomorrow, May 30, 2012 at 0800 Detroit Time, we have scheduled a VW/EPA web conference to discuss the MPI/FSI fuel injection system.
I have attached a back-up copy of the slides that will be presented.
Please refer to the meeting invitation for connection details.
Best regards,
Len
Leonard W. Kata
Manager, Emission Regulations and Certification
Engineering and Environmental Office
Volkswagen Group of America, Inc.
Phone: (248) 754-4204
Cell: (248) 797-3886
E-Mail: leonard.kata@vw.com

To: "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de]; [Steffen.Vieser@AUDI.DE]; inc Vieser, Steffen (I/EA-83)" Wehrly/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; DavidA Wright/AA/USEPA/US@EPA:William Ott/AA/USEPA/US@EPA:"Schlueter. Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; im Snyder/AA/USEPA/US@EPA:Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; oel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA:DavidA Wright/AA/USEPA/US@EPA:William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; oel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; tephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; hris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; avidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; illiam Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; Stendel, Detlef (EASZ/1)" [detlef.stendel@volkswagen.de] From: "Kata, Leonard (EEO)" Sent: Wed 5/30/2012 12:55:33 PM Subject: VW/EPA - MPI-FSI Fuel System When: Wednesday, May 30, 2012 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada). Where: Web conference Note: The GMT offset above does not reflect daylight saving time adjustments. \*~\*~\*~\*~\*~\*~\* Ex. 6 Join by Phone Ex. 6 Ex. 6 First online Ex. 6

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Sorry about the confusion. We have rescheduled the conference call for 1000 Detroit time.

The slides have been distributed a couple of time. Please let me know if you need these.

Web conference details are shown above.

Best regards,

Len

Leonard W. Kata Manager, Emission Regulations and Certification Engineering and Environmental Office Volkswagen Group of America, Inc.

Phone: (248) 754-4204 Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com<mailto:leonard.kata@vw.com>

To: "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de]; Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; inc Wehrly/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA:"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; im Snyder/AA/USEPA/US@EPA:Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: [extern.hannah.helena.schlueter@volkswagen.de]; oel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA:DavidA Wright/AA/USEPA/US@EPA:William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; oel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; tephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: [extern.hannah.helena.schlueter@volkswagen.de]; hris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; avidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: [extern.hannah.helena.schlueter@volkswagen.de]; illiam Ott/AA/USEPA/US@EPA;"Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; Stendel, Detlef (EASZ/1)" [detlef.stendel@volkswagen.de] From: "Kata, Leonard (EEO)" Sent: Wed 5/30/2012 1:00:26 PM Subject: VW/EPA Web Conference To all: This is the "belt and suspenders" approach. Please note that the VW/EPA web conference for MPI-FSI Fuel System is now on for 1000 Detroit time today. Details should appear on your calendars. Best regards, Len

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]
Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]
From: "Rodgers, William (EEO)"
Sent: Wed 5/30/2012 7:56:54 PM
Subject: VW Group - Decision Information submitted for VID D3UB-CAQ

Hi Jim,
I submitted test data and DI for the 2013 Audi A6 quattro 2.0L TFSI. This is a new worst case EDV for the test group DADXV02.03UB already certified.

Manufacturer retests are required for FTP and HWY cycles due to High Fuel Economy for the ETW.

No new technology is used.

A running change and revised application will follow.

Regards,

Bill Rodgers

**VWGoA** 

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Thur 5/31/2012 4:49:49 PM

Subject: VW Group - Certificate Requested for TG DVWXV03.6U41

Hello Jim,

Just a heads up that I submitted a new application and Certificate Request for 2013 Test Group DVWXV03.6U41, VW Passat 3.6L VR6. If you can get it processed by the end of next week that's fine.

Regards,

**Bill Rodgers** 

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

From: "Rodgers, William (EEO)"
Sent: Tue 6/5/2012 3:11:28 PM

Subject: VW Group Certification Requests for 3.0L V6 TDI

Hello Jim,

I have submitted Applications and Certification Requests for the following 3.0L V6 TDI Test Groups:

All required manufacturer confirmatory tests have been completed.

Anything you can do to get these processed this week would be appreciated. Let me know if there are nay questions.

DADXT03.02UG – VW Touareg TDI (LDT3)

DADXT03.03UG - Audi Q7 TDI (LDT4)

Regards,

**Bill Rodgers** 

VWGoA EEO

(248) 754-4219

From: "Rodgers, William (EEO)"
Sent: Tue 6/5/2012 5:13:29 PM

Subject: RE: VW Group Certification Requests for 3.0L V6 TDI

snyder.jim@epa.gov William.Rodgers@vw.com michael.giles@vw.com

Hi Jim,

They are all about the same priority. Carry on.

Thanks Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 05, 2012 11:16 AM

To: Rodgers, William (EEO)

Subject: Re: VW Group Certification Requests for 3.0L V6 TDI

I already have other VW group cert requests that I working on through. Do you want me to jump to these two instead?

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Rodgers, William (EEO)" < William.Rodgers@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>

Date: 06/05/2012 11:11 AM

Subject: VW Group Certification Requests for 3.0L V6 TDI

Hello Jim,

I have submitted Applications and Certification Requests for the following 3.0L V6 TDI Test Groups: All required manufacturer confirmatory tests have been completed.

Anything you can do to get these processed this week would be appreciated. Let me know if there are nay questions.

DADXT03.02UG – VW Touareg TDI (LDT3) DADXT03.03UG – Audi Q7 TDI (LDT4)

Regards, Bill Rodgers VWGoA EEO (248) 754-4219

Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]

**From:** "Giles, Michael (EEO)" **Sent:** Wed 6/6/2012 6:51:40 PM

Subject: VW Group - Decision Information for Audi A6/A7 3.0L

Hello Jim,

I have recently submitted decision information requests for 2 vehicles (A6 and A7) for Audi test group DADXJ03.03UF.

## Some details:

- These vehicles are FEDV's and will support a running change letter which is on the way.
- The vehicles have stop/start as you should recall. We submitted tests under 4 configurations (see table below)
- Configuration 2 also has aevaporative tests which support a new evaporative family. This new family with "B" suffix is similar to the existing "A" suffix but with a 5 gram bleed canister.
- The vehicles all had high FE and will require mfr. re-tests if they are not selected by EPA.

## Vehicle ID: D3UF-CAQ

Conf.	Model	Stop-Start	Other
0	A6	Active	
1	A6	In-Active	
2	A6	Active	* Evap tests for cfg #2
3	A6	In-Active	

Please contact me if you have any questions about this.

Regards,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229

FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]
From: "Giles, Michael (EEO)"
Sent: Wed 6/6/2012 8:17:36 PM
Subject: RE: VW Group - Decision Information for Audi A6/A7 3.0L
Snyder.jim@epa.gov
michael.giles@vw.com
William.Rodgers@vw.com

I will try to get the letter to you by tomorrow morning.

The main difference is that the vehicles now have start/stop. Comparing to MY2012, there is also a new engine code, which likely reflects a software change. I will ask though and forward a more detailed

Regarding fuel economy:

answer.

For the A6: Compared to MY 2012, My 2013 was slightly worse for city, and 1 mpg better on highway.

For the A7: Compared to MY 2012, the MY2013 is slightly worse for both city and highway.

Also, per our recent agreement with Dave Good, we plan to average start / stop results only for the FTP and US06 tests. For the other tests (Hwy, SC03, Cold CO) we will use inactive configurations only for FE because Start-Stop mode has no effect.

Thanks

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 06, 2012 3:52 PM

To: Giles, Michael (EEO)

Subject: Re: VW Group - Decision Information for Audi A6/A7 3.0L

When can I see the running change letter? Can you tell me what the changes are? Does it have higher FE?

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/06/2012 02:52 PM

Subject: VW Group - Decision Information for Audi A6/A7 3.0L

## Hello Jim,

I have recently submitted decision information requests for 2 vehicles (A6 and A7) for Audi test group DADXJ03.03UF.

#### Some details:

- These vehicles are FEDV's and will support a running change letter which is on the way.
- The vehicles have stop/start as you should recall. We submitted tests under 4 configurations (see table below)
- Configuration 2 also has aevaporative tests which support a new evaporative family. This new family with "B" suffix is similar to the existing "A" suffix but with a 5 gram bleed canister.
- The vehicles all had high FE and will require mfr. re-tests if they are not selected by EPA.

Conf.	Model	Stop-Start	Other
0	A6	Active	
1	A6	In-Active	
2	A6	Active	* Evap tests for cfg #2
3	A6	In-Active	

Please contact me if you have any questions about this.

Regards, Mike

Michael Giles Certification Specialist Engineering and Environmental Office Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 United States of America Phone +1-248-754-4229 FAX +1-248-754-4207

**From:** "Giles, Michael (EEO)" **Sent:** Wed 6/6/2012 8:42:49 PM

Subject: RE: VW Group - Decision Information for Audi A6/A7 3.0L

snyder.jim@epa.gov michael.giles@vw.com mailto:Snyder.Jim@epamail.epa.gov snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

Hi Jim,

We did get a note through Richard Thomas (email from Dave). Thanks for the quick reply.

On another topic, I uploaded another application today and tried to request a certificate for the Eos. This is a carryover test group (DVWXV02.03SA). You should see the request soon, unless it failed because of the GHG rule (I'm leaving before I find out it whether it passed VERFIY validation).

Thanks

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 06, 2012 4:22 PM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Decision Information for Audi A6/A7 3.0L

Thanks for the clarification.

Yes, I thought I had sent you a confirmation earlier regarding the cycles but I guess I hadn't sent it.

Jim Snyder
Light-Duty Vehicle Group
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United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

Date: 06/06/2012 04:17 PM

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The main difference is that the vehicles now have start/stop. Comparing to MY2012, there is also a new engine code, which likely reflects a software change. I will ask though and forward a more detailed answer.

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For the A7: Compared to MY 2012, the MY2013 is slightly worse for both city and highway.

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To: Giles, Michael (EEO)

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snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/06/2012 02:52 PM

Subject: VW Group - Decision Information for Audi A6/A7 3.0L

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Vehicle ID: D3	BUF-CAQ
----------------	---------

Conf.	Model	Stop-Start	Other	
0	A6	Active		
1	A6	In-Active		
2	A6	Active	* Evap tests for cfg #2	<u>)</u>
3	A6	In-Active		

Please contact me if you have any questions about this.

Regards, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]

**From:** "Giles, Michael (EEO)" **Sent:** Thur 6/7/2012 7:41:01 PM

Subject: RE: VW Group - Decision Information for Audi A6/A7 3.0L

snyder.jim@epa.gov michael.giles@vw.com mailto:Snyder.Jim@epamail.epa.gov snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

Hello Jim,

FYI I sent a request for certificate today for this test group (DADXJ03.03UF) with new evaporative family DADXR0140C7B. For this running change, I also submitted a revised initial application with the running change letters and other data (CSI, etc.) updated.

Please review and let us know if you have questions to issue the certificate.

Note – please cc Bill on any messages tomorrow as I will be out of the office Friday.

Thanks,

Mike

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Sent: Wednesday, June 06, 2012 4:22 PM

To: Giles, Michael (EEO)

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Yes, I thought I had sent you a confirmation earlier regarding the cycles but I guess I hadn't sent it.

Jim Snyder Light-Duty Vehicle Group Compliance Division United States Environmental Protection Agency (734) 214-4946

1

## snyder.jim@epa.gov

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To: Jim Snyder/AA/USEPA/US@EPA

Date: 06/06/2012 04:17 PM

Subject: RE: VW Group - Decision Information for Audi A6/A7 3.0L

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For the A7: Compared to MY 2012, the MY2013 is slightly worse for both city and highway.

Also, per our recent agreement with Dave Good, we plan to average start / stop results only for the FTP and US06 tests. For the other tests (Hwy, SC03, Cold CO) we will use inactive configurations only for FE because Start-Stop mode has no effect.

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From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/06/2012 02:52 PM

Subject: VW Group - Decision Information for Audi A6/A7 3.0L

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I have recently submitted decision information requests for 2 vehicles (A6 and A7) for Audi test group DADXJ03.03UF.

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- These vehicles are FEDV's and will support a running change letter which is on the way.
- The vehicles have stop/start as you should recall. We submitted tests under 4 configurations (see table below)
- Configuration 2 also has aevaporative tests which support a new evaporative family. This new family with "B" suffix is similar to the existing "A" suffix but with a 5 gram bleed canister.
- The vehicles all had high FE and will require mfr. re-tests if they are not selected by EPA.

Vehicle II	D: D3UF-CAQ		
Conf.	Model	Stop-Start	Other
0	A6	Active	
1	A6	In-Active	
2	A6	Active	* Evap tests for cfg #2
3	A6	In-Active	

Please contact me if you have any questions about this.

Regards, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Fri 6/8/2012 2:24:19 PM

Subject: VW Group - 2013 Tiguan test decision information

Hi Jim,

I submitted new fuel economy tests and Decision Information for the two configurations of 2013 Tiguan 2.0T Front-wheel drive (with and without low resistance tires). These models were already certified some time ago with carryover data from 2012 model year. The factory has since made a change in TCM software to for the 2013 Start of Production.

VW316 20145 – Configuration 2 (Front-wheel drive with Low resistance tires)

VW316 20145 – Configuration 3 (Front-wheel drive with Normal tires)

Regards,

To: Cc: From:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com] "Giles, Michael (EEO)" Mon 6/11/2012 2:19:01 PM
Sent: Subject:	RE: VW Group Certification Requests for 3.0L V6 TDI
Hello Jim,	
As a follow	up, could you advise on the status of the two 3.0L diesel certificates below?
We are be	ing told this is urgent, so any assistance you can provide would be appreciated.
Thanks,	
Mike	
Sent: Tues To: "Jim Sr	gers, William (EEO) day, June 05, 2012 11:11 AM nyder' (Snyder.Jim@epamail.epa.gov)' Michael (EEO)
Subject: V	W Group Certification Requests for 3.0L V6 TDI
Hello Jim,	
I have sub	mitted Applications and Certification Requests for the following 3.0L V6 TDI Test Groups:
All require	d manufacturer confirmatory tests have been completed.
Anything y nay questi	rou can do to get these processed this week would be appreciated. Let me know if there are ons.
DADXT03.0	02UG – VW Touareg TDI (LDT3)
DADXT03.0	03UG – Audi Q7 TDI (LDT4)
Regards,	

1

Bill Rodgers

VWGoA EEO

(248) 754-4219

From: "Giles, Michael (EEO)"
Sent: Mon 6/11/2012 3:11:30 PM

Subject: RE: VW Group Certification Requests for 3.0L V6 TDI

snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com Snyder.Jim@epamail.epa.gov

Great, thanks!

We will have another application for the 2.0L coming in hopefully today.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, June 11, 2012 11:01 AM

To: Giles, Michael (EEO)

Subject: RE: VW Group Certification Requests for 3.0L V6 TDI

So far it's looking like a fairly quiet week and there are none in front of them so this week looks likely unless I find some problems.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/11/2012 10:19 AM

Subject: RE: VW Group Certification Requests for 3.0L V6 TDI

Hello Jim,

As a follow up, could you advise on the status of the two 3.0L diesel certificates below?

We are being told this is urgent, so any assistance you can provide would be appreciated.

Thanks, Mike

From: Rodgers, William (EEO)

Sent: Tuesday, June 05, 2012 11:11 AM

To: "Jim Snyder' (Snyder.Jim@epamail.epa.gov)"

Cc: Giles, Michael (EEO)

Subject: VW Group Certification Requests for 3.0L V6 TDI

# Hello Jim,

I have submitted Applications and Certification Requests for the following 3.0L V6 TDI Test Groups: All required manufacturer confirmatory tests have been completed.

Anything you can do to get these processed this week would be appreciated. Let me know if there are nay questions.

DADXT03.02UG – VW Touareg TDI (LDT3) DADXT03.03UG – Audi Q7 TDI (LDT4)

Regards, Bill Rodgers VWGoA EEO (248) 754-4219

Cc: "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Giles, Michael (EEO)"

[michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Tue 6/12/2012 3:34:17 PM

Subject: VW Group - Revised Certificate Requests

Hi Jim,

I have processed Revised Test Group and Certificate Requests for the following TG/Evap combinations:

Changes to the Manufacturer Codes and Division numbers were required to comply with Verify Fuel Economy Program and Release 10. Please process the approvals so we can get the fuel economy entered into the system.

cert\_request\_DADXV05.2LR8\_DADXR0130R8A

cert\_request\_DADXV04.03UJ\_DADXR0130D61

cert\_request\_DVWXV06.3UA8\_DVWXR0155D4B

Regards,

**Bill Rodgers** 

**Emissions Certification Specialist** 

VOLKSWAGEN GROUP OF AMERICA, INC.

**Engineering and Environmental Office** 

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

From: "Giles, Michael (EEO)" Sent: Tue 6/12/2012 5:08:20 PM Subject: VW Group - Audi Test Group DADXJ03.03UF Hi Jim, As a follow up to my voice message, I am trying to make a minor correction to the test group data for the above test group (evap DF's need correction). However, I get a rejection message indicating a possible open cert request. I ran a report for open cert requests which shows one item for this test group (below). I think perhaps you could reject this and I will re-submit, or let me know if you need more info or have any suggestions. Thanks, Mike **Certificate Request Submission Information** Certificate Request Information Details Request Process Code: N Manufacturer Specific Details EPA Manufacturer Code: ADX Model Year: 2013 Test Group Name: DADXJ03.03UF Commerce Introduction Date: 20120806

1

**Application Specific Details** 

Meet All Applicable Standards Indicator : Y Meet All Applicable Requirements Indicator : Y

CARB Executive Order Issued Indicator: NA

**OBD System Approval Indicator: Y** 

To:

Jim Snyder/AA/USEPA/US@EPA[]

ORVR System Approval Indicator : Y Compliance Fee Paid Indicator : Y No Defeat Device Indicator : Y CAP2000 Conditional Indicator : N ICI Certificate Indicator : N

Alternate Fuel Converter Certificate Indicator : N

**EPA Generated Certificate Request Details** 

Original Receipt Date: 20120607 Certificate Status Text: UNDREV

Michael Giles

**Certification Specialist** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

Cc:	"Rodgers, William (EEO)" [William.Rodgers@vw.com]		
From:	"Giles, Michael (EEO)"		
Sent:	Tue 6/12/2012 8:33:01 PM		
Subject:			
	nyder.Jim@epamail.epa.gov]		
	snyder.jim@epa.gov michael.giles@vw.com		
	<u>yder.Jim@epamail.epa.gov</u> n <u>@epa.gov</u>		
	iles@vw.com		
	odgers@vw.com		
v viiii Giii.i (	odgolo@vw.oom		
Hello Jim,			
As a follow	up for our running change for test group (DADXJ03.03UF) with new evaporative family		
DADXR014			
57.157.11.01	00751		
It was nece	essary to correct the application to correct some minor errors in deterioration factors. So, that		
	and submitted today. Due to the VERIFY locking issues I have requested another certificate.		
	3		
Please note	e that the running change letter is in the application. Let us know if you need anything further		
from us to	process the new certificate.		
Thanks,			
Mike			
	s, Michael (EEO)		
	sday, June 07, 2012 3:41 PM		
To: 'Jim Sn			
Cc: Rodger			
Subject: RE	E: VW Group - Decision Information for Audi A6/A7 3.0L		
Hello Jim,			

1

To:

Jim Snyder/AA/USEPA/US@EPA[]

FYI I sent a request for certificate today for this test group (DADXJ03.03UF) with new evaporative family DADXR0140C7B. For this running change, I also submitted a revised initial application with the running change letters and other data (CSI, etc.) updated.

Please review and let us know if you have questions to issue the certificate.

Note – please cc Bill on any messages tomorrow as I will be out of the office Friday.

Thanks,

Mike

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To: Giles, Michael (EEO)

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Jim Snyder
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Date: 06/06/2012 04:17 PM

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Jim Snyder Light-Duty Vehicle Group Compliance Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/06/2012 02:52 PM

Subject: VW Group - Decision Information for Audi A6/A7 3.0L

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Vehicle I	D: D3UF-CAQ		
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Please contact me if you have any questions about this.

Regards, Mike

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United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Cc: From:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com] "Giles, Michael (EEO)" Wed 6/13/2012 7:41:41 PM	
Sent: Subject:	VW Group - Request for Certificate DVWXV02.0U5N	
Hello Jim,		
	submitted the application and request for certificate for Volkswagen carryover test group .0U5N. This test group is the one featuring the 2.0L TDI without SCR (Jetta, Audi A3, en).	
This test g Convertibl	roup is carryover but includes two new models introduced as FEDV's (Beetle, Beetle e).	
	We would like to request that this be high priority for VW group due to sales volume and timing. Please let me know if you have any questions.	
Thanks,		
Mike		
Michael G	iles	
Certification	on Specialist	
Engineerin	ng and Environmental Office	
Volkswage	en Group of America, Inc.	
3800 Ham	lin Road	
Auburn Hi	lls, MI 48326	
United Sta	tes of America	
	248-754-4229	
FAX +1-24	8-754-4207	

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Thur 6/14/2012 12:32:31 PM

Subject: VW Group - Revised Cerificate needed DADXT03.02UG

Hi Jim,

I submitted a Certificate Lock request that requires a revised Certificate as the result of Verify Rel. 10 FE Program changes. We had to change the Mfr. Code to VWX, Div. 1, in the models covered section. It's something I missed when I recent submitted this to you. Sorry about that.

Thanks,

**Bill Rodgers** 

VWGoA EEO

(248) 754-4219

From: "Rodgers, William (EEO)"
Sent: Thur 6/14/2012 12:44:45 PM

Subject: VW Group - Audi Certificate request for DADXV05.2LR8

Jim,

Just FYI, the pending Certificate Request for test group DADXV05.2LR8 submitted Tuesday is another one where we had to make a change to the Mfr. Code to satisfy the Verify FE program Release 10.

Thanks,

**Bill Rodgers** 

VWGoA EEO

(248) 754-4219

From: "Giles, Michael (EEO)"
Sent: Thur 6/14/2012 7:03:35 PM

Subject: RE: VW Group - Request for Certificate DVWXV02.0U5N

snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

Hi Jim,

Thanks for the notice, some issues caused my original cert request to be rejected (see below).

As it turns out, I was forced to make minor corrections to the DF values in the CSI. These values are now identical to previous years (a data communication error caused the wrong values in the original version). I have submitted the corrected application (R01) and received an cert request (accepted by verify, so you should also have it) /

Just a reminder this is rather high priority for us, so any assistance you can provide on this one would be appreciated.

Regards,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 13, 2012 5:35 PM

To: Giles, Michael (EEO)

Subject: Re: VW Group - Request for Certificate DVWXV02.0U5N

As of 5:30, The only new request today was DADXV02.03UB.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/13/2012 03:41 PM

Subject: VW Group - Request for Certificate DVWXV02.0U5N

# Hello Jim,

Today we submitted the application and request for certificate for Volkswagen carryover test group DVWXV02.0U5N. This test group is the one featuring the 2.0L TDI without SCR (Jetta, Audi A3, SportWagen).

This test group is carryover but includes two new models introduced as FEDV's (Beetle, Beetle Convertible).

We would like to request that this be high priority for VW group due to sales volume and timing. Please let me know if you have any questions.

Thanks, Mike

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United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Cc: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com] "Giles, Michael (EEO)" Fri 6/15/2012 12:45:45 PM VW Group - Decision Information
Hello Jim,	
	ng we sent decision information requests for the new FEDV Beetle models which will be the 2.0L TDI test group DVWXV02.05UN for MY 2013.
Please adv	ise of your decision at your earliest convenience.
Thanks,	
Mike	
Michael Gi	les
Certification	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	is, MI 48326
United Stat	tes of America
Phone +1-2	248-754-4229
FAX +1-248	3-754-4207

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Fri 6/15/2012 6:13:59 PM

Subject: Verify Question

Jim,

I revised the Initial Application for the test group DVWXJ02.03UA to reflect new tests we submitted representing new calibration for Start of Production on the worst case vehicle (Tiguan 4Motion automatic). My question is, do we need a revised Certificate if we already have one based on carryover data from 2012 model year? the Carline already exists on the Certificate and the tests were all waived.

Thanks

**Bill Rodgers** 

**Emissions Certification Specialist** 

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Mon 6/18/2012 11:02:23 AM

Subject: RE: Verify Question

snyder.jim@epa.gov William.Rodgers@vw.com michael.giles@vw.com william.rodgers@vw.com

Thanks Jim.

That was my thought as well, just making sure. Yes, the Application was revised with the new worst case data in the CSI.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Friday, June 15, 2012 3:21 PM

To: Rodgers, William (EEO) Subject: Re: Verify Question

If the new data was waived and the Part 1 was revised with the new CSI emission data then I think you are done since the certificate is unchanged.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>

Date: 06/15/2012 02:14 PM Subject: Verify Question

Jim,

I revised the Initial Application for the test group DVWXJ02.03UA to reflect new tests we submitted representing new calibration for Start of Production on the worst case vehicle (Tiguan 4Motion automatic). My question is, do we need a revised Certificate if we already have one based on carryover data from 2012 model year? the Carline already exists on the Certificate and the tests were all waived.

Thanks
Bill Rodgers
Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC. Engineering and Environmental Office Auburn Hills, MI (248) 754-4219 william.rodgers@vw.com

To: Cc: From:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com] "Giles, Michael (EEO)"
Sent: Subject:	Mon 6/18/2012 1:22:26 PM RE: VW Group - Decision Information
Hello Jim,	
	mitted the supplemental information for the vehicle selected for testing (Beetle Convertible
Automatic	j.
Vehicle ID:	: VW324 10220/13
	nfiguration #: 0
	o Name: DVWXV02.0U5N
Please let	me know the test date when it is set on your end.
Thanks,	
Mike	
	s, Michael (EEO) y, June 15, 2012 8:46 AM
	yder (Snyder.Jim@epamail.epa.gov)
_	W Group - Decision Information
Hello Jim,	

This morning we sent decision information requests for the new FEDV Beetle models which will be

included in the 2.0L TDI test group DVWXV02.05UN for MY 2013.

Please advise of your decision at your earliest convenience.
Thanks,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

From: Sent: Subject:	"Thomas, Richard (EEO)" Mon 6/18/2012 2:54:39 PM 2013 Lamborghini Fuel Economy Label
Hello Jim;	
, Th l	
	for taking care of the reissue of the Audi 5.2L test group certificate last Friday, so I was able to e Lamborghini Gallardo fuel economy label today. Four Gallardo labels were finally accepted by
Best regard	ds,
Richard	

To:

To: Cc: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com] "Giles, Michael (EEO)" Tue 6/19/2012 7:43:27 PM	
Subject:	VW Group - Decision Info 1.4L Jetta Hybrid	
Hello Jim,		
l just subm	itted a decision request for the new 1.4L Jetta Hybrid (1.4L), for test group DVXXV01.4PHE.	
This yabial	a has now technology all around (angine assence tive family ORD system ORVD system). Our	
	e has new technology all around (engine, evaporative family, OBD system, ORVR system). Our ding is that EPA will most likely want to do confirmatory tests.	
Please let r	me know if you have any questions processing this request.	
Thanks,		
Mike		
na: 1 (C)		
Michael Gi		
Certificatio	on Specialist	
Engineerin	g and Environmental Office	
Volkswage	n Group of America, Inc.	
3800 Haml	in Road	
Auburn Hil	Auburn Hills, MI 48326	
United Stat	tes of America	
Phone +1-2	248-754-4229	
EAV :1 340	3-754-4207	
rAΛ +1-24δ	3 / 34 420/	

**From:** "Giles, Michael (EEO)" **Sent:** Tue 6/19/2012 8:36:54 PM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

No plug in, I believe it is a standard "HEV" because there is no outside power source other than the fuel.

The available date is September 17th.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:33 PM

To: Giles, Michael (EEO) Cc: Rodgers, William (EEO)

Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

Is this a plug-in hybrid? When will it be available for testing?

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" < William.Rodgers@vw.com>

Date: 06/19/2012 03:45 PM

Subject: VW Group - Decision Info 1.4L Jetta Hybrid

Hello Jim,

I just submitted a decision request for the new 1.4L Jetta Hybrid (1.4L), for test group DVXXV01.4PHE.

This vehicle has new technology all around (engine, evaporative family, OBD system, ORVR system). Our

understanding is that EPA will most likely want to do confirmatory tests.

Please let me know if you have any questions processing this request.

Thanks, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Linc Wehrly/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im

Snyder/AA/USEPA/US@EPA[] Ex. 7

From:

Mon 5/17/2010 1:32:20 PM Sent:

Subject: Road Load Determination Meeting

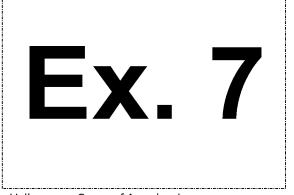
Hello Linc and Jim:

As we have discussed, Volkswagen representatives are scheduled to meet with you on Wednesday, June 2, 2010 at 09:30 to discuss road load determination and the responses to the questions provided in your email of April 2, 2010. Our representatives are preparing a formal presentation and formulating the responses to the questionnaire.

I had previously stated that one or two people from our local office and another two or three from Germany would attend. Considering the travel time and distance for our German colleagues, I would like to know whether it would be acceptable to have them join the meeting by telephone. I would still attend in person and provide the presentation materials, with the technical experts engaged in the dialogue. I am able to set up a conference call-in number and access code.

I would appreciate your thoughts on this. Please recognize that this request should not be construed as minimizing the importance of this meeting. We look forward to a detailed discussion.

Best regards,



Volkswagen Group of America, Inc.



# Ex. 7

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Hart, Robert (VWoA)"

Sent: Tue 5/25/2010 12:50:58 PM

Subject: RE: Q& tests

Audi accepts the fuel economy values from the confirmatory tests for vehicle B3UG-TAQ.

Robert Hart

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, May 24, 2010 4:26 PM

To: Hart, Robert (VWoA) Subject: Q& tests

Bob, can you send us a note saying VW accepts the FE values of the Audi Q7 EPA tests for our records?

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division

1

United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

Sent:	"Hart, Robert (VWoA)" Wed 5/26/2010 11:32:48 AM VW Group: Audi A8 - B3UH-DAQ - Results Accepted
Hello Jim,	
	received the results for the Audi A8 (B3UH-DAQ) in Verify. Audi has accepted the results. I Be Mazaitis to release the car this morning.
Best regard	ls,
Bob Hart	
Robert Hart	t.
Engineering	g and Environmental Office
Volkswager	n Group of America, Inc.
3800 Hamli	n Road
Auburn Hill	s, MI 48326
Phone: (248	3) 754-4224
Fax: (248) 7	754-4207
E-mail: robe	ert.hart@vw.com

To:

Jim Snyder/AA/USEPA/US@EPA[]

To: Jim Snyder/AA/USEPA/US@EPA[] From: "Hart, Robert (VWoA)" Fri 5/28/2010 12:07:36 PM Sent: RE: Supplemental Information for Vehicles Selected for Confirmatory Testing Subject: Hello Jim, In order for the lab to have the correct manual transmission shift tables, Verify has a section under the Confirmatory Test Decision page where new mfr. shift tables can be uploaded. This doesn't happen very often because most new cars use existing shift tables that have been in the lab database since CFEIS. Except for the standard EPA ones, shift tables are manufacturer specific. In this case the (VW) shift tables existed, just not is the Audi specific section of the database. I downloaded the required VW shift tables using my Volkswagen login, made the necessary modifications to the shift table reports to turn them into input files and resubmitted them through my Audi login. Best regards, **Bob Hart** 

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, May 27, 2010 3:05 PM

To: Hart, Robert (VWoA)

Subject: Re: Supplemental Information for Vehicles Selected for Confirmatory Testing

Thanks for the info. To confirm, are you saying that the shift tables are now in Verify?

I informed the lab to check if it looks okay.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946

snyder.j	iim@epa.gov
From:	"Hart, Robert (VWoA)" <robert.hart@vw.com></robert.hart@vw.com>
To:	Jim Snyder/AA/USEPA/US@EPA
Date:	05/27/2010 02:13 PM
Subject	supplemental Information for Vehicles Selected for Confirmatory Testing
Hello Jir	m,
	ploaded the required Supplemental Information for Bentley vehicle I.D. BY $61021~cfgs~0$ and $4~and~VW~1.D.~VW416~80218~cfg~0.$
	re also shift tables uploaded for the FTP and HFET for VW416 80218.  I is in an Audi test group and the required shift tables were not listed in the Audi database in Verify.
Best reg	gards,
Bob Har	t
Robert	Hart
Enginee	ring and Environmental Office
3800 Ha	agen Group of America, Inc. amlin Road Hills, MI 48326
Fax: (24	(248) 754-4224 8) 754-4207 robert.hart@vw.com

From: Ex. Tue 6/1/20	10 8:52:25 PM on: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in AA-
Jim —	
I will bring a small proje	ctor.
Ex. 7	
From: Snyder Iim@ena	mail ena gov [mailto:Snyder lim@enamail ena gov]

## Non-Responsive

Subject: RE: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in Non-Responsive

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

Sent: Tuesday, June 01, 2010 4:28 PM

Ex. 7

Non-Responsive

From:		
	Ex. 7	
Τ		
10:		

Jim Snyder/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA, Maria Peralta/AA/USEPA/US@EPA

Date:

06/01/2010 03:53 PM

1

Subject:

RE: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in Non-Responsive

#### To all:

Attached is an advance copy of the presentation that VW will discuss tomorrow during our meeting on road load determination. Several participants will join by telephone from Germany, so it would be appreciated if a speaker telephone is available. The call-in details are provided below.

**Ex. 7** and I will attend the meeting in person. We expect the following participants, representing Volkswagen and Audi to join by telephone:

**Ex.** 7

Audio Conference Information:

### Non-Responsive

Best regards,

**Ex.** 7

Volkswagen Group of America, Inc.

Ex. 7

<<EPA Road Load Determination Meeting.pdf>>

Original Appointment
From: Jim Snyder/AA/USEPA/US
Sent: Monday, May 17, 2010 10:42 AM
To: Jim Snyder/AA/USEPA/US; Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov; <b>Ex. 7</b>
Wehrly.Linc@epamail.epa.gov; Reineman.Martin@epamail.epa.gov; Healy.Stephen@epamail.epa.gov;
Anderson.Tom@epamail.epa.gov
Cc: Peralta.Maria@epamail.epa.gov
Subject: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in Non-Responsive
When: Wednesday, June 02, 2010 9:30 AM-11:30 AM (GMT-05:00) Eastern Time (US & Canada).
Where: Non-Responsive Where: Non-Responsive
VVIICIE: INDIRESPONSIVE I
Invitation: Road Load Determination Meeting w/ VW
06/02/2010 -
Chair:
Jim Snyder/AA/USEPA/US
Sent By:
Snyder.Jim@epamail.epa.gov
Locations
Location:
Non-Responsive
Rooms:
Non-Responsive
HOII-ICOPOIIGIVE
Snyder.Jim@epamail.epa.gov
Jim Snyder has invited you to a meeting. You have not yet responded.
Required:
Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Ex. 7 Linc
Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom
Anderson/AA/USEPA/US@EPA

Optional:

Maria Peralta/AA/USEPA/US@EPA

Description

Hello Linc and Jim:

As we have discussed, Volkswagen representatives are scheduled to meet with you on Wednesday, June 2, 2010 at 09:30 to discuss road load determination and the responses to the questions provided in your e-mail of April 2, 2010. Our representatives are preparing a formal presentation and formulating the responses to the questionnaire.

I had previously stated that one or two people from our local office and another two or three from Germany would attend. Considering the travel time and distance for our German colleagues, I would like to know whether it would be acceptable to have them join the meeting by telephone. I would still attend in person and provide the presentation materials, with the technical experts engaged in the dialogue. I am able to set up a conference call-in number and access code.

I would appreciate your thoughts on this. Please recognize that this request should not be construed as minimizing the importance of this meeting. We look forward to a detailed discussion.

Best regards,

Ex. 7

<< File: ATT244576.htm >> << File: c104150.ics >> << File: ecblank.gif >> << File: pic00987.gif >> [attachment "EPA Road Load Determination Meeting.pdf" deleted by Jim Snyder/AA/USEPA/US]

To: From:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)"
Sent: Subject:	Fri 6/4/2010 7:33:31 PM VW Group: More Applications / Certificate Requests Submitted
Hello Jim,	
	ousy. There are Certificate requests for test groups: BADXT03.0TLF (1) / BADXV02.03UA (3). They all have the same SOP (this week) and same priority.
Whatever	you can do to get them turned around quickly is greatly appreciated.
Best regar	ds,
Bob Hart	
Robert Ha	rt
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Ham	lin Road
Auburn Hil	ls, MI 48326
Phone: (24	8) 754-4224
Fax: (248)	754-4207
E-mail: rok	pert.hart@vw.com

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Wed 6/9/2010 1:14:59 PM RE: missing test data
Hello Jim,	
	sults for the 50'F FTP were in the database, I just forgot to put standards for it in the testgroup on file. Results won't be listed in the Cert Summary Info Report without them.
I have corr	ected it and will upload the corrected application as soon as I have processed it.
above. The	ed the OBD approval for the Q7 diesel last night, so that is my priority before the test group ere will be two 3.0I diesel applications. The one ending in 3UG (Audi Q7 - LDT4) is the priority. the actual tests and LDT3 designation for the Touareg, the two diesel application are basically
Best regard	ds,
Bob Hart	
Robert Har	rt
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	ls, MI 48326
Phone: (24	8) 754-4224
Fax: (248)	754-4207

E-mail: robert.hart@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 08, 2010 6:31 PM

To: Hart, Robert (VWoA) Subject: missing test data

Bob, for test group BADXV05.2LR8 BI see a test # listed for 50F test but no emission data. Looks like its missing.

Test Number BADX10006239 Exhaust/Evaporative Test Number Link

Test Procedure 52 - Fed. fuel 50 F exh. Test Fuel Type 61 - Tier 2 Cert Gasoline

Test Date 2009-08-20 DF Type Mfr. Determined

4WD Dyno No State of Charge Delta

MFR Test Comment 4k FED. FUEL 50'F FTP - Tested as AUDI R8 SPYDER CONVERTIBLE 6 spd. autom. 2 dr. EDV -

ETW: 4250 None

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

To: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Wed 6/23/2010 3:23:31 PM
Subject:	VW Group: Certificate Request for MY 2011 VW Test Grp: BVWXV03.6U46 Submitted
Hello Jim,	
Just a "hea	ds up" for a certificate request submitted for MY 2011 VW Test Grp: BVWXV03.6U46.
Best regard	ds,
Bob Hart	
Robert Har	rt
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	ls, MI 48326
Phone: (24	8) 754-4224
Fax: (248)	754-4207
E-mail: rob	pert.hart@vw.com

To:	Linc Wehrly/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im
Snyder/A/	A/USEPA/US@EPA[]
Cc:	Ex. 7
From:	LA. /
Sent:	Fri 6/25/2010 8:23:29 PM
Subject:	Meeting to Discuss GHG Calculation Procedure

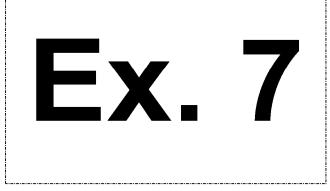
Hello Linc and Jim:

As mentioned during our recent meeting on road load determination, VW would like to meet with you to discuss our initial attempt at some of the compliance calculations for the GHG rule.

Our suggestion is to begin with the Early Credit Calculation for CO2 (40 CFR 86.1867-12(a)). We will present you with our understanding of the rules pertaining to the four pathway approaches and the input data necessary to accomplish the calculations. We will follow with presentation of an example of the early CO2 credit calculation and comparison of the pathway results.

My proposal would be to meet on Thursday, July 1, 2010 at 09:30, provided that you are available. If not, please let me know what your schedules may allow.

Best regards,



Volkswagen Group of America, Inc.

Ex. 7

To:		inc Wehrly/AA/USEPA/US@EPA;Jim
Snyder/A	A/USEPA/US@EPA[];    im Snyder/AA/USEF	'A/US@EPA[]
Cc: From:	Ex. 7	
Sent:	Tue 6/29/2010 5:18:29 PM	!
Subject:	Invitation: Volkswagen Meeting to Discuss	s Early CO2 Credit Calculations (Jul 1 11:00
AM EDT i	n <b>Ex. 7</b>	

To all:

As discussed with Linc Wehrly at EPA, we are scheduled to meet on Thursday, July 1, 2010. The subject will be the early CO2 credit provisions in the EPA GHG final rule. We intend to present our understanding of the regulatory requirements and a sample calculation for the four pathway options.

Volkswagen's goal is to gain assurance that the calculation approach being considered and determination of the appropriate pathway is correct.

We did not discuss an end time, but from the Volkswagen side, we are flexible on this point.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

To: Jim Snyder/AA/USEPA/US@EPA[]

**From:** "Hart, Robert (VWoA)" **Sent:** Thur 7/8/2010 2:39:53 PM

Subject: RE: Certificate for Test Group BVWXV02.0U5N - 2.0I Diesel

Thanks Jim.

I guess it will just take a little time for it to register in Verify.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, July 08, 2010 10:36 AM

To: Hart, Robert (VWoA)

Subject: Re: Certificate for Test Group BVWXV02.0U5N - 2.0l Diesel

its issued

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Hart, Robert (VWoA)" < Robert. Hart@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

07/08/2010 07:44 AM

Subject:

Certificate for Test Group BVWXV02.0U5N - 2.0l Diesel

Hello Jim,

Can you check on the status of the signing of the Certificate for Test Group BVWXV02.0U5N (2.0I Diesel)? Obviously, we can't get an ARB Executive Order until we submit the EPA Certificate to the ARB and their signing procedure takes considerably longer.

Any help you can provide to expedite the process will be greatly appreciated.

Best regards,

**Bob Hart** 

Robert Hart

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Phone: (248) 754-4224 Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Mon 7/12/2010 8:00:45 PM Running Change Requires a Revised Certificate
Oubject.	realising change requires a revised certificate
Hello Jim,	
Another "l	neads up".
certificate	nitted a running change to add the Jetta model to diesel test group BVWXV02.0U5N. A revised is required. Please process it as soon as possible. The only change to the application is the f the Jetta model. Everything required has been uploaded.
Best regar	ds,
Bob Hart	
Robert Ha	rt
Engineerir	ng and Environmental Office
Volkswage	en Group of America, Inc.
3800 Ham	lin Road
Auburn Hi	lls, MI 48326
Phone: (24	18) 754-4224
Fax: (248)	754-4207
E-mail: rol	pert.hart@vw.com

Sent: Mon 7/19/2010 5:55:36 PM Subject: VW Group: Confidential Vehicle Names Question
Hello Jim,
What is the procedure for keeping a vehicle's name confidential until official release by the manufacturer?
The question comes from Lamborghini. They want to keep the commercial name of the new Lamborghini confidential until they release it during the Geneva Auto Show.
I need to know before I submit the certification documentation. It is still a week or two away, but we need to know so we can plan for whatever is necessary to accomplish it.
Does the "Introduction into Commerce Date" on the Certificate Request in the Verify System guarantee that no information will be released until that date?
I have already talked to ARB. <b>Ex. 7</b> is checking with management to get their latest policy.
Best regards,
Bob Hart
Robert Hart
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road

Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)"

To: From: Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

From: Ex. 7

**Sent:** Fri 7/30/2010 10:22:03 PM

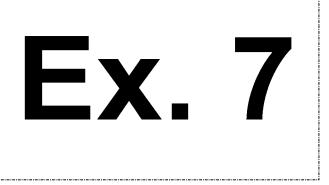
Subject: RE: Lamborghini Catalyst By-Pass Request

2007 request.pdf

Hello Jim:

There were a couple of pages at the end of the scanned document that included prior approvals. I have also attached a copy of the entire document that was ultimately stamped approved by EPA. Please let me know if you need anything else. I would appreciate some information on the status of this request.

Best regards,



Volkswagen Group of America, Inc.

Ex. 7

 $From: Snyder. Jim@epamail.epa.gov\ [mailto:Snyder. Jim@epamail.epa.gov]\\$ 

Sent: Tuesday, July 20, 2010 11:47 AM

To: Ex. 7

Subject: Re: Lamborghini Catalyst By-Pass Request

Is there supposed to be an attachment of the earlier approvals?

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From:			
	Ex. 7 @vw.com	>	
То:	lim Chudor/AA/USEDA/US@EDA	F., 7	Mark sa gay
	Jim Snyder/AA/USEPA/US@EPA,	Ex. 7	@arb.ca.gov
Date:	07/20/2010 10:24 AM		

Subject:

Lamborghini Catalyst By-Pass Request

Hello Jim and Ex. 7

As you may be aware, I submitted documents through VERIFY and EDMS that describe the function of the exhaust system on the LB83x Lamborghini application. This system includes a bypass of the downstream catalysts under extreme operating conditions. The function is analogous to the system from a past model year Lamborghini Gallardo which was approved by EPA and ARB. Copies of the old approval documents are provided for reference.

I just wanted to send a reminder that the request is in the workflow pending agency review. Your review and response would be appreciated.

Best regards,



2

Ex. 7

Volkswagen Group of America, Inc.

**Ex.** 7

### VOLKSWAGEN of America, Inc.

Mr. Linc Wehrly
Compliance and Innovative Strategies Division
Light-Duty Vehicle Group
U.S. Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, Michigan 48105

Mr. Allen Lyons, Chief Mobile Sources Operations Divisions Haagen-Smit Laboratory P.O. Box 8001 9528 Telstar Avenue El Monte, California 91734-8001 Leonard W. Kata Nome
Team Leader Title
Engineering & Env. Office Deportment
248-754-4204 Phone
248-754-4207 Fox
Leonard.kata@vw.com E-Moil

March 14, 2006 Date

Volkswagen of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Phone +1 248 754 5000 Fax +1 248 754 4930

Subject: Lamborghini Murcielago Exhaust System

#### Gentlemen:

On March 1, 2006, representatives of Automobili Lamborghini, S.p.A. and Volkswagen of America, Inc. participated in a telephone conference call with you to discuss the design and function of the 2007 model year Lamborghini Murcielago exhaust system. In particular, Lamborghini provided details to the agencies regarding bypass valves included in the exhaust system. The intent of the call was to provide an overview of the technical description of the system and to seek feedback from EPA and ARB.

Prior to the call, you were provided with a drawing of the Murcielago exhaust system and a document that addresses the rationale for, and function of the system.

On March 8, 2006, EPA provided telephone confirmation that the agencies had discussed the system and concluded that it is acceptable and does not qualify as a defeat device. A formal, written response was offered.

We would appreciate a more formal response. Enclosed, for reference, is a copy of the technical information previously provided by e-mail.

Sincerely,

. W. Kata

**Enclosure** 

# Ex. 4 - CBI

# Ex. 4 - CBI

To: Cc: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com] "Hart, Robert (VWoA)" Wed 8/11/2010 5:27:52 PM		
Subject:	Confirmatory Test Results		
Hello Jim,			
Axel Reisner told me that you will send the test results via e-mail. I assume that he is talking about scanned copies of the QC'd lab reports for the tests.			
Please include both Bill Rodgers (William.Rodgers@vw.com) and me as recipients of the e-mail so we have them if one of us is not here.			
Thanks,			
Bob Hart			
DOD Hait			
Robert Hart			
Engineering and Environmental Office			
Volkswagen Group of America, Inc.			
3800 Hamlin Road			
Auburn Hill	s, MI 48326		
Phone: (248) 754-4224			
Fax: (248) 754-4207			
E-mail: robert.hart@vw.com			

To: Jim Snyder/AA/USEPA/US@EPA[] From: "Hart, Robert (VWoA)"

Sent: Fri 8/13/2010 8:14:06 PM
Subject: RE: Tiquan test results
mailto:Snyder.Jim@epamail.epa.gov

Yes, I already have them.

Thanks,

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Friday, August 13, 2010 4:12 PM

To: Hart, Robert (VWoA) Subject: RE: Tiquan test results

Looks like they are in Verify now too.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

Bob

"Hart, Robert (VWoA)" < Robert.Hart@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

08/13/2010 04:10 PM

Subject:

RE: Tiquan test results

Thanks, Jim.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Friday, August 13, 2010 4:04 PM

To: Rodgers, William Cc: Hart, Robert (VWoA) Subject: Tiquan test results

Showed up but Hwy is missing.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Hart, Robert (VWoA)"

Sent: Wed 8/18/2010 11:32:27 AM

Subject: RE: Diesel Shift Tables

Hello Jim,

The shift schedules for the diesel use the same upshift points as the gasoline engines for the FTP and HWY but the declutch points are different as noted in my original message.

The cert engineer said that he will have to get back to me on the US06 shift schedule. The diesel may require additional downshifts for the US06.

**Bob Hart** 

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, August 17, 2010 4:55 PM

To: Hart, Robert (VWoA) Subject: Re: Diesel Shift Tables

Bob, since this diesel uses the same schedules as the gas engines, is the US06 the same as the Tiquan we just tested? It uses 0035, 0036, and 0020 for US06.

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From:

"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

08/13/2010 08:47 AM

Subject:

**Diesel Shift Tables** 

#### Hello Jim,

According to our diesel cert engineer, shift tables 590 0035 (FTP) and 590 0036 (HFET) can be used as indicated in the MY 2009 Application Common Sections (Section 12). These shift tables should already be in the EPA Lab database. They are the standard VW gasoline engine M6 shift tables.

Here are the upshift points by speed.

**UP-SHIFT** 

- 1 2 15 mph
- 2-3 25 mph
- 3 4 40 mph
- 4-5 47 mph
- 5-6 52 mph

Due to the gear ratios in the diesel transmission the following declutch points must be used:

**DECLUTCH** 

- 6-0 30 mph
- 5-0 25mph
- 4-0 20mph

I am still waiting for the US06 schedule.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)

Sent: Wednesday, August 11, 2010 4:00 PM

To: 'Snyder.Jim@epamail.epa.gov'

Subject: Diesel Shift Tables

Hello Jim,

I will contact Germany for to see if any of the shift tables currently in the system will work for the M6 diesel. I should have an answer for you by the end of the week.

Best regards,

**Bob Hart** 

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road Auburn Hills, MI 48326

Phone: (248) 754-4224 Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Hart, Robert (VWoA)"

Sent: Wed 8/18/2010 5:37:15 PM

Subject: RE: Retest Request for VW Tiguan - VW416 80218 cfg. 0

I will let you know Bentley's answer first thing in the morning.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, August 18, 2010 11:55 AM

To: Hart, Robert (VWoA)

Cc: Mazaitis.Vincent@epamail.epa.gov

Subject: Re: Retest Request for VW Tiguan - VW416 80218 cfg. 0

Bob, do you know if Bentley is considering a retest on the USO6? If so, we should do it before we switch fuels on monday.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Cc:

"Reisner, Axel, Dr. (EASZ/1)" <axel.reisner@volkswagen.de>

Date:

08/18/2010 09:01 AM

Subject:

Retest Request for VW Tiguan - VW416 80218 cfg. 0

Hello Jim,

I informed Vince Mazaitis that Volkswagen has requested a retest of the FTP and HWFET for the VW Tiguan – VW416 80218 cfg. 0.

Both fuel economy values are more than 3% different from the manufacturer test results.

Best regards,

**Bob Hart** 

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Phone: (248) 754-4224 Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Wed 8/18/2010 8:00:38 PM Another Test Waiver Request Coming Soon			
Hello Jim,				
There is ar	nother test waiver request coming soon. This time for the Audi TT in Test Group BADXT02.03UA.			
An additio worst case	nal engine is being added to the test group as a running change- fuel economy only — not a new			
Also, I hav	e seen the retest schedule for VW614 80218 in the VERIFY System.			
Best regar	ds,			
Bob				
Robert Ha	rt			
Engineerin	g and Environmental Office			
Volkswage	en Group of America, Inc.			
3800 Hamlin Road				
Auburn Hi	lls, MI 48326			
Phone: (24	18) 754-4224			
Fax: (248) 754-4207				
E-mail: rob	pert.hart@vw.com			

To: Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Mary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; oberts French/AA/USEPA/US@EPA;Mary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; ary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]

Cc: "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Johnson, Stuart"

[Stuart.Johnson@vw.com]; Giles, Michael" [michael.giles@vw.com]

From: "Kata, Leonard"

**Sent:** Wed 8/25/2010 10:54:35 PM

Subject: Volkswagen Meeting with EPA Regarding Early CO2 Credits

EARLY CREDIT CALC.pdf

Hello all:

As you may recall, Volkswagen met with you and other EPA staff members to discuss our interpretation of the early CO2 credits portion of the final GHG rule. We also raised a number of questions. At the end of the meeting we began to present a sample early credit determination, based on a preliminary version of an early credit calculation tool. However, it was difficult to follow without some prior study. We agreed to provide a written version.

Attached is a sample calculation that was prepared by hand to check against the tool that we are developing. As of now, the result of the hand calculations match the automated version. The attached version also explains the assumptions made in understanding the regulations and making the calculations. We would appreciate EPA review of this example to assure us that we are on the right track.

I will file a formal copy of the information through VERIFY, along with a marked-up copy of the slides presented at our meeting. The mark-up are the EPA comments. Please note that there are still some open issues. One in particular concerns the determination of CAFE-based credits as described for Pathway 3.

The current calculations are only for CO2 credits. We stated in the meeting that we are still evaluating early A/C credits and would come back to EPA on that topic.

Finally, there was one slide at the end of the presentation (Slide 31) that we did not have time to cover. It pertains to CH4 and N2O compliance procedures. We would like EPA concurrence with the compliance approaches presented. We also questioned the requirement of having to apply either the stand-alone CH4 and N2O compliance approach or the incorporation of CH4 and N2O in the CREE calculation to the entire fleet, and whether there is any flexibility on this point.

Best regards,		
Len		

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: From:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)"				
Sent: Subject:	Thur 8/26/2010 1:42:32 PM Release Request for Test Vehicle VW416 80218 cfg. 0				
Hello Jim,					
Volkswage	n has accepted the test results for Test Vehicle VW416 80218 cfg. 0 (VW Tiguan).				
Please rele	ase the vehicle for pick-up on Monday, August 26, 2010.				
Best regard	ds,				
Bob Hart					
Robert Har	t				
Engineering and Environmental Office					
Volkswage	n Group of America, Inc.				
3800 Hamlin Road					
Auburn Hills, MI 48326					
	·-,···· ·				
Phone: (24	8) 754-4224				
Fax: (248) 7	Fax: (248) 754-4207				
E-mail: robert.hart@vw.com					

To: Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Mary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; oberts French/AA/USEPA/US@EPA;Mary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; ary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]
Cc: "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Johnson, Stuart" [Stuart.Johnson@vw.com]; Giles, Michael" [michael.giles@vw.com]  From: "Kata, Leonard"  Sent: Wed 9/1/2010 4:21:56 PM  Subject: RE: Volkswagen Meeting with EPA Regarding Early CO2 Credits
Subject. RE. Volkswagen Meeting with EFA Regarding Early CO2 Credits
To all:
Just a reminder that we would appreciate your thoughts on the early credit exercise submitted to EPA. The documents attached to the earlier e-mail have been downloaded in the VERIFY system, along with a marked-up copy of the slides from our July 1, 2010 meeting. The mark-ups reflect the EPA comments made at the meeting.
We appreciate your verification of the early credit calculation procedure and an interpretation regarding the open issue on Pathway 3 (CAFE –based standard using a CAFE calculation with total federal sales versus sales from states other than California and Section 177 states).
Please feel free to contact me with any questions.
Best regards,.
Len
Leonard W. Kata
Manager, Emission Regulations and Certification
Engineering and Environmental Office
Volkswagen Group of America, Inc.
1

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

From: Kata, Leonard

Sent: Wednesday, August 25, 2010 6:55 PM

To: Wehrly.Linc@epamail.epa.gov; 'french.roberts@epa.gov'; 'manners.mary@epa.gov';

Good.David@epamail.epa.gov; 'Snyder.Jim@epamail.epa.gov' Cc: Kohnen, Christoph (VWGoA); Johnson, Stuart; Giles, Michael Subject: Volkswagen Meeting with EPA Regarding Early CO2 Credits

Hello all:

As you may recall, Volkswagen met with you and other EPA staff members to discuss our interpretation of the early CO2 credits portion of the final GHG rule. We also raised a number of questions. At the end of the meeting we began to present a sample early credit determination, based on a preliminary version of an early credit calculation tool. However, it was difficult to follow without some prior study. We agreed to provide a written version.

Attached is a sample calculation that was prepared by hand to check against the tool that we are developing. As of now, the result of the hand calculations match the automated version. The attached version also explains the assumptions made in understanding the regulations and making the calculations. We would appreciate EPA review of this example to assure us that we are on the right track.

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Finally, there was one slide at the end of the presentation (Slide 31) that we did not have time to cover. It pertains to CH4 and N2O compliance procedures. We would like EPA concurrence with the compliance approaches presented. We also questioned the requirement of having to apply either the stand-alone CH4 and N2O compliance approach or the incorporation of CH4 and N2O in the CREE calculation to the entire fleet, and whether there is any flexibility on this point.

Best regards,
Len
Leonard W. Kata
Manager, Emission Regulations and Certification
Engineering and Environmental Office
Volkswagen Group of America, Inc.
Phone: (248) 754-4204
Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Mon 9/27/2010 2:24:21 PM VW Group: Test Waiver Requests Submitted				
Hello Jim,					
I have just BADXV04.2	finished submitting four test waiver requests to Verify for model year 2011 test group 2375.				
	two vehicles representing the R8 Spyder and R8 Coupe with an existing 4.2I V8 engine and an manual transmission and a manual transmission.				
	are getting new catalysts (which has already been discussed with you), a new calibration, new nd a separate AIR pump for each bank for model year 2011.				
Let me kno	ow if you have any questions.				
Best regard	ds,				
Bob Hart					
Robert Hai	rt				
Engineerin	g and Environmental Office				
Volkswage	n Group of America, Inc.				
3800 Ham	lin Road				
Auburn Hil	ls, MI 48326				
Phone: (24	8) 754-4224				
·	Fax: (248) 754-4207				
	E-mail: robert.hart@vw.com				

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Mon 9/27/2010 8:21:18 PM Test Waiver Request Errors - 9/27/2010
Hello Jim,	
This is in re	gard to our phone conversation on 9/27/2010.
waiver req	d an error that I made in the percent of standard for the SCO3 4k CO tests results for the R8 test uests. The macro I used added the DF to the 4k result before calculating the percent of Actually, the results were less than 70% for both tests.
To compou	and that error, I thought the confirmatory test criteria was greater than or equal to 90%.
	ted out to me that it is only greater than 90%, so since the FTP 50k NOx is 90.0% percent of the t is not necessary to perform manufacturer retests.
l apologize	for the confusion. It's been a rough Monday.
Best regard	ds,
Bob Hart	
Robert Har	t
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	ls, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Tue 11/9/2010 9:25:43 PM Specifications and Calibration information for Power Measurement Shunt 19 07-42-42.pdf 19 07-57-08.pdf
Hello Jim,	
	gave me with some specifications and calibration information for the shunt that VW provided areg Hybrid to measure the power for the hybrid tests.
He thought	t that the EPA might want it for documentation. See attachments.
Best regard	ds,
Bob Hart	
Robert Har	t
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	ls, MI 48326
Phone: (24	8) 754-4224
Fax: (248)	754-4207
E-mail: rob	ert.hart@vw.com



<u>№ 2009E12385</u> **Date** Nov. 9, 2009

# **CALIBRATION CERTIFICATE**

Customer	
	HIOKI E.E. CORPORATION
	Y. Taki
	Inspector
	Quality Assurance Department

Model

9278

Name

UNIVERSAL CLAMP ON CT

Production№

090900270

The above listed product(s) is/are calibrated in accordance with the HIOKI standards. This also certifies that all reference instruments used in the calibration process can be traced back to all or some of the official standards laboratories of the nations affiliated with the International Committee for Weights and Measures (CIPM), such as the National Institute of Advanced Industrial Science and Technology, the National Institute of Information and Communications Technology, and NIST (National Institute of Standards and Technology).

### Instruments used

Model	Name	Control number	Production number
5520A	CALIBRATOR	000-10-115	8475009
3458A	MULTIMETER	000-20-193	US28030720
6620	PRECISION PHASEMETER	000-21-002	459
R9211B	FFT SERVO ANALYZER	505-55-008	02020139
4025	HIGH SPEED POWER AMPLIFIER/SUPPLY	000-50-079	145901
	SHUNT RESISTOR $(10\Omega)$	505-31-087	
10A/100mV	TRIAX-SHUNT	000-31-163	R719364

Note: The issuing date of this CALIBRATION CERTIFICATE may differ from the inspection date in the INSPECTION DATA SHEET.



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	AC	2 A	AC	0.0200	V 0.0	189 V	~	0.0211 V	(	0.0201	V )
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No. 9278-2

Chapter 2 Measurement Procedure

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# Chapter 3 Specification

١			0000
	Model	9277	92/8
1.0	Rated current (AC/DC)	20 A f.s.	200 A f.s.
	Output voltage (AC/DC)	2 V/20 A	2 V/200 A
	The maximum permissible input range (DC to 3 kHz)	50 Arms (75 Apeak)	350 Arms (500 Apeak)
	Input resistance (DC)	Max. 0.05 mΩ	Max. 0.002 mΩ
	Output resistance	20 ប	
	Basic accuracy 23±3°C (73±5°F)	DC and 45 Hz to 66 Hz, 30 min or more warming-up after degaussing Amplitude: $\pm 0.5\%$ rdg. $\pm 0.05\%$ f.s. Phase: within $\pm 0.2\%$ (DC has no provision)	S Hz, 30 min or fter degaussing rdg. ±0.05% f.s. 2° ion)
	Period of guaranteed accuracy	1 year	
	Amplitude-frequency characteristic (deviation from accuracy)	DC to 1 kHz 1 k to 50 kHz 50 k to 100 kHz	within ±1.0% within ±2.5% within ±5.0%
	Phase-frequency characteristic	DC to 1 kHz 1 k to 50 kHz 50 k to 100 kHz	within ±0.5° within ±2.5° within ±5.0°
	Temperature coefficient	Sensitivity: within ±0.05% rdg. Offset: within ±0.005% f.s. /°C	±0.05% rdg. /°C 305% f.s. /°C
	Operating temperature and humidity range	0 to 40°C (32 to 104°F), Max. 80%RH (no condensation)	04°F), condensation)
	Storage temperature and humidity range	-10 to 50°C (14 to 122°F), Max. 80%RH (no condensation)	122°F), condensation)
	Effect of conductor	Within ±0.5% (DC. 55 Hz)	Within ±1.5% (DC, 55 Hz)

16

3536 VmsAC for 15 seconds. (between case and clamp sensor (aperture)) (between electric circuit and case, between electric circuit and core, between electric circuit and core, sensor (aperture)

Indoor, <Height 2000 m (6562 feet) ASL

Operating environment

Maximum rated voltage to earth

20 mm (0.79") or less

600 V (CATII), 300 V (CATIII)

	(HIROS
Mating receptacle	RM515ERB-10SD

±150 mA ±250 mA (with rated input)

±12 V to ±15 V (with accuracy guaranty but tracking)

Supply voltage Diameter of measurable conductors

Power supply

capacity

Max. 7.2 W (with rated input)

Max. 3.6 W (with rated input)

Supply consumption

Dimensions and

mass

Approx. 176WX69HX27D mm (6.93"WX2.72"HX1.06"D)(excluding projections) Approx. 470 g (16.6 oz.)

**△** CAUTION

· Be careful to avoid connecting voltage improperly, as the internal circuitry may be destroyed.

• The capacity of the power supply is at least  $\pm 0.5$  A.

· Demagnetization occurs after pin 7 is shorted to ground and then opened.

Chapter 3 Specification

EN61010-2-032:2002
Type B current sensor
Messurement category II, III,
Pollution Degree 2 (4000 V expected transient Overvoltage)
EN61326:1997+A1:1998+A2:2001

EMC:

6 (3 set)

9375 CARRYING CASE Instruction manual

Markband

Safety:

Standards

Approx. 3 m (9.84 feet)

Cord length Accessories Chapter 3 Specification

Max. 0.2 A 927

Effect of external magnetic field (400 A/m, 55 Hz and DC)

Model

Dielectric strength

To: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[]  [Ex. 7]  Tue 11/16/2010 6:30:57 PM
Subject:	RE: Pre-cert mtg
Hello Jim:	
	the reminder. We are putting the finishing touches on our pre-certification letter and the 2012 pre-model GHG report. I will be contacting you within the next few days to schedule a
Regards,	
Ex. 7	
	ler.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov] day, November 16, 2010 1:04 PM Ex. 7 e-cert mtg
start of Jan cert mtg w to show th	as just talking to <b>Ex. 7</b> and he said VW is planning on releasing some 2012MY vehicles uary. I thought I'd remind you that prior to any 2012 certification, it is required to have a Prehich includes VW's proposed strategy for meeting the GHG requirements. The GHG plans are at you have a viable plan worked out. We realize this is new and plans may change but we rify that the manufactures understand it correctly.
Compliance	Vehicle Group e and Innovative Strategies Division tes Environmental Protection Agency

snyder.jim@epa.gov

From:	Vincent Mazaitis/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im A/USEPA/US@EPA[] "Hart, Robert (VWoA)" Mon 11/29/2010 12:39:07 PM
Sent: Subject:	Hybrid Prep/Test Procedure Requirements for the VW Touareg Hybrid
Hello Jim a	nd Vince,
AND the er	aind the lab prep/test drivers that the Start-Stop has to be enabled during the preconditioning missions test. We understand that this was overlooked for the preconditioning of the previous ot (according to the driver).
the precon	d start-stop capability during preconditioning may influence the state of charge at the end of ditioning and the start of the UDDS test. This may result in an unexpected influence on the fuelor charge balance of the system.
The instruc	tions are posted on the vehicle.
To enable t	the Start-Stop:
	ood lock must be engaged before the car is driven with the hood open on the dyno. The dummy" must be engaged into the hood latch prior to starting the vehicle.
2) The d	oors must be shut
3) The d	rivers seat belt lock must be engaged (either by the provided dummy or the actual seat-belt. )
Best regard	ds,
Bob Hart	
Robert Har	t
Engineerin	g and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Mon 12/6/2010 4:34:08 PM Touareg Hybrid Confirmatory Test Results Accepted
Hello Jim,	
Volkswage cfg. 0).	en accepts the results of the confirmatory test for the VW Touareg Hybrid (ID: VW526 710023 –
Please can	cel the retest and release the vehicle for pick-up tomorrow (Tuesday 7-Dec-10).
The first at	ttempt to send this went to the wrong address.
D t	<b>.</b>
Best regar	us,
Bob Hart	
Robert Ha	rt
Engineerin	g and Environmental Office
Volkswage	en Group of America, Inc.
3800 Ham	
Auburn Hi	lls, MI 48326
Phone: (24	18) 754-4224
Fax: (248)	754-4207
E-mail: rok	pert.hart@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

From: Ex. 7

Sent: Fri 12/10/2010 12:56:53 PM Subject: Confernece Call - Audi

Hello Jim:

I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi. Ex. 7 from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.

Please let me know what you think.

Regards,



Volkswagen Group of America, Inc.

**Ex.** 7

To: Jim Snyder/AA/USEPA/US@EPA[]

From: Ex. 7

Sent: Tue 12/14/2010 6:44:54 PM Subject: RE: FW: Confernece Call - Audi

Hi Jim:

Tuesday at 10:00 sounds good to me. Lets pencil that in. I will let Ex. 7 know and see what he says.

Best regards,



Volkswagen Group of America, Inc.



From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, December 14, 2010 1:35 PM

To: Ex. 7

Subject: Re: FW: Confernece Call - Audi

Next Tuesday is mtg from 9 to 10 again so I guess monday morning. How about 10:00?

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From:	Ex. 7
То:	Jim Snyder/AA/USEPA/US@EPA
Date:	12/14/2010 01:27 PM
Subject:	FW: Confernece Call - Audi

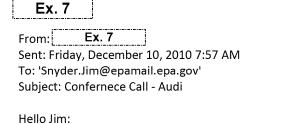
Hi Jim:

I received your message that the proposed time for tomorrow is not good. Unfortunately, **Ex. 7** is not in the office on Thursday or Friday, so my suggestion is to postpone until early next week. Would you propose a time, preferably no later than 11:00 a.m. on Monday (12/20) or Tuesday (12/21) that would work for you?

I will try to get some materials to you prior to the call. To be more specific about the topics:

- 1. General discussion concerning start-stop devices.
- 2. Shift speeds for manual transmission vehicles with start-stop devices.

Thanks,



I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi.

Ex. 7 from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.

Please let me know what you think.

Regards,

**Ex.** 7

Volkswagen Group of America, Inc.

Ex. 7

Jim Snyder/AA/USEPA/US@EPA[]
Ex. 7 To:

From:

Sent: Tue 12/14/2010 6:45:15 PM

Subject: Recall: FW: Confernece Call - Audi

**Ex. 7** would like to recall the message, "FW: Confernece Call - Audi".

To: Jim Snyder/AA/USEPA/US@EPA[]

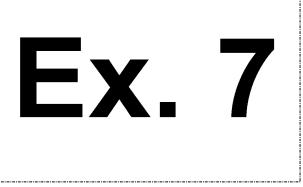
From: Ex. 7

Sent: Wed 12/15/2010 1:23:16 PM
Subject: RE: FW: Conference Call - Audi
mailto:Snyder.Jim@epamail.epa.gov

Hello Jim:

I can added a few people to my desk telephone using the conference feature, but I think that a conference call would be easier. I can easily set this up so you could call in to a local number. I will send the coordinates to you and other cans join as needed.

Best regards,



Volkswagen Group of America, Inc.



From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, December 14, 2010 5:51 PM

To: Ex. 7

Subject: RE: FW: Conference Call - Audi

**Ex. 7** I scheduled a room. Can you and **Ex. 7** connect and both call in to our phone? Or do we need a conference number?

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From:	Ex. 7
То:	Jim Snyder/AA/USEPA/US@EPA
Date:	

Subject:

RE: FW: Confernece Call - Audi

12/14/2010 01:47 PM

Hi Jim:

I just wrote back and tried to recall the message. I read your message too fast.

Next Monday at 10:00 sounds good. I will let **Ex. 7** know.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, December 14, 2010 1:35 PM

To: Ex. 7 Subject: Re: FW: Confernece Call - Audi	
Next Tuesday is mtg from 9 to 10 again so I guess monday morning. How about 10:00?	
Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov	
From:  Ex. 7	
To: Jim Snyder/AA/USEPA/US@EPA	
Date: 12/14/2010 01:27 PM	
Subject: FW: Confernece Call - Audi	
Hi Jim:	
I received your message that the proposed time for tomorrow is not good. Unfortunately, <b>Ex. 7</b> is not in the office on Thursday or Friday, so my suggestion is to postpone until early next week. Would you propose a tin preferably no later than 11:00 a.m. on Monday (12/20) or Tuesday (12/21) that would work for you?	

I will try to get some materials to you prior to the call. To be more specific about the topics:

- 1. General discussion concerning start-stop devices.
- 2. Shift speeds for manual transmission vehicles with start-stop devices.

Thanks,

Ex. 7			
From:	Ex. 7		
Sent: Frida	y, Decembe	r 10, 2010 7:	:57 AN
To: 'Snvde	r.Jim@epan	nail.epa.gov'	

Subject: Confernece Call - Audi

Hello Jim:

I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi.

Ex. 7 from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.

Please let me know what you think.

Regards,

**Ex.** 7

Volkswagen Group of America, Inc.

**Ex.** 7

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Hart, Robert (VWoA)"

Sent: Wed 12/15/2010 6:18:18 PM

Subject: RE: VW Group: MY 2012 Test Waiver Requests

Hi Jim,

There are two more coming shortly.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, December 15, 2010 1:15 PM

To: Hart, Robert (VWoA)

Subject: Re: VW Group: MY 2012 Test Waiver Requests

I now see six total. Is that all of them?

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

12/15/2010 11:28 AM

Subject:

VW Group: MY 2012 Test Waiver Requests

Hello Jim,

I just submitted two more MY 2012 test waiver requests. I expect to submit two more by the end of the day if possible.

The first four were for two FEDV's (automatic and manual transmission versions) for test group CVWXV02.5U35 – federal only BIN 5 new midsized sedan (NMS).

This is a new model to be produced at VW's new factory in Tennessee.

The two from today and the two yet to be submitted are a PZEV version of the same vehicle.

These are all fuel economy tests for the first two test group applications that I have already submitted for certification.

Best regards,

**Bob Hart** 

Robert Hart

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Phone: (248) 754-4224 Fax: (248) 754-4207

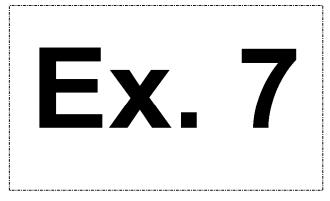
E-mail: robert.hart@vw.com

To:	Jim Snyder/AA/USEPA/US@EPA[]	
Cc:	Ex. 7	
	Ex. 7	
From:	Ex. 7	
Sent:	Fri 12/17/2010 3:51:32 PM	
Subject:	RE: ADP	

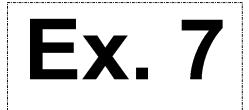
Hello Jim:

I am not sure whether you are alerted to the letter I submitted to VERIFY. The vast majority of 2012 test groups are carryover from 2011. As mentioned in our certification preview, we use the VWADP that has been approved by EPA in the past and used for several years now. The SRC is primarily for Diesel test groups. The letter requests carryover of the previously approved procedure and nothifies EPA of the use of the SRC.

Best regards,



Volkswagen Group of America, Inc.



From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, December 06, 2010 3:42 PM

To:	Ex. 7	į
Subied	+· ΛΩD	

Ex. 7 I talked to Ex. 7 about ADP and VW uses the SRC process which doesn't require approval. So all I need is a letter saying you are using EPA's SRC and we are all set on this.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov To: Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;GePA;Tom Anderson/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; tom Anderson/AA/USEPA/US@EPA[]

From: Ex. 7

**Sent:** Mon 12/20/2010 12:39:41 PM

Subject: RE: Invitation: Audi phone conference: Start/stop and manual trans (Dec 20 10:00 AM

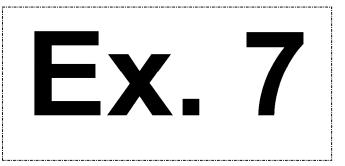
EST in Non-Responsive

01 STSTSY-survey and MT.PDF

Hello All:

Attached are a few slides for our conference call this morning.

Best regards,



Volkswagen Group of America, Inc.



<<01\_STSTSY-survey and MT.PDF>>

-----Original Appointment-----From: Jim Snyder/AA/USEPA/US

Sent: Tuesday, December 14, 2010 5:49 PM

To: Jim Snyder/AA/USEPA/US; Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov; Non-Responsive Wehrly.Linc@epamail.epa.gov; Reineman.Martin@epamail.epa.gov; Healy.Stephen@epamail.epa.gov; Anderson.Tom@epamail.epa.gov

1

Subject: Invitation: Audi phone conference: Start/stop and manual trans (Dec 20 10:00 AM EST in Non-Responsive Non-Responsive When: Monday, December 20, 2010 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada). Where:
Invitation: Audi phone conference: Start/stop and manual trans
12/20/2010 -
Chair: Jim Snyder/AA/USEPA/US
Sent By: Snyder.Jim@epamail.epa.gov
Rooms:
Non-Responsive
Snyder.Jim@epamail.epa.gov Jim Snyder has invited you to a meeting. You have not yet responded.
Required: Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA  Ex. 7  Linc Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA
Description
EPA room phone is Non-Responsive
I will try to get some materials to you prior to the call. To be more specific about the topics:

- 1. General discussion concerning start-stop devices.
- 2. Shift speeds for manual transmission vehicles with start-stop devices << File: ATT1507133.htm >> << File: c174846.ics >> << File: ecblank.gif >> << File: pic07156.gif >>

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: Ex. 7

Sent: Tue 12/28/2010 5:30:01 PM

Subject: 2012 Pre-Model GHG Report

Hello Jim:

To ensure that we have met the December 31, 2010 deadline for a formal report submission, I have submitted the 2012 pre-model year GHG report through VERIFY, as we have discussed. This report uses our format and has been corrected to address the typographical errors noticed during the 12/01/2010 precertification meeting. The cover letter addresses the points raised in the regulations; such as, report contents, the use of credits (A/C, and early credits), and our plan regarding the incorporation of the N2O and CH4 values in an OCREE calculation.

Our intent is to further refine this report using the templates provided by Dave Good.

Best regards, and best wishes for the new year.



Volkswagen Group of America, Inc.

Ex. 7

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Wed 1/5/2011 9:20:28 PM VW Group: Another Cert Request		
Hello Jim,			
Welcome t	o the New Year! I hope your shoulder is OK.		
	itted another model year 2012 certificate request – Test Group CADXJ02.03UA. The cert fees have been paid for a while already.		
Best regard	ds,		
Bob Hart			
Robert Har	t		
Engineering and Environmental Office			
Volkswage	n Group of America, Inc.		
3800 Hamlin Road			
Auburn Hil	ls, MI 48326		
Phone: (24	8) 754-4224		
Fax: (248)	Fax: (248) 754-4207		
E-mail: robert.hart@vw.com			

Cc: "Thomas, Richard" [Richard.Thomas@vw.com]; illem

VandenBroek/AA/USEPA/US@EPA[]
From: "Hart, Robert (VWoA)"
Sent: Thur 1/6/2011 3:57:47 PM

Subject: RE: CVWXV02.03SA and CVWXV02.03PA

Hi Jim,

When I originally asked you to delay issue of the certificates for the two test groups until 2011, I thought that the cert fees were based on the issue date of the certificate.

Due to this situation, I now understand that they are based on the application submission date. Had I known this earlier, I would have waited to submit the applications.

Best regards,

**Bob Hart** 

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, January 06, 2011 10:45 AM

To: Thomas, Richard; Hart, Robert (VWoA); VandenBroek.Willem@epamail.epa.gov

Subject: Re: CVWXV02.03SA and CVWXV02.03PA

I reviewed the cert request yesterday. Once I get the word from Bill that we have received the funds, I will approve the two certificates.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

Willem VandenBroek/AA/USEPA/US

To:

"Thomas, Richard" < Richard. Thomas@vw.com>

$\sim$		
•	С.	

Jim Snyder/AA/USEPA/US@EPA

Date:

01/06/2011 09:30 AM

Subject:

CVWXV02.03SA and CVWXV02.03PA

Richard,

You should have received an automated email a few days ago saying that EPA had received payment for the Subject families at \$33,974 each. When we received the forms we charged them against the ACH payment for \$69,992 received from VW on 12/17/2010. (The forms for the remainder of that payment were filed from Germany). All that appears to be in order.

However, we noticed that the applications for these two families were filed in Calendar Year 2010. The fee is determined by the calendar year of the application (as stated at the top of the form), which, for applications received in calendar 2010, is \$34,849. Consequently, these two families have been designated as Short, On Hold, until the \$875 each has been received, upon which they will be listed as paid and cleared for certification review.

Let me know if you have any questions.

Bill Vanden Broek 734-214-4468 To: Willem VandenBroek/AA/USEPA/US@EPA[]

Cc: David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im

Snyder/AA/USEPA/US@EPA[]

From: "Thomas, Richard"

Sent: Fri 1/7/2011 1:31:36 PM

Subject: FW:

20110107074935647.pdf

Hello Bill;

Please find the Miscellaneous Payment Due forms for the two Volkswagen Test Groups where they were submitted during calendar year 2010 (last week in 2010) for which we paid the 2011 calendar year fee. It was originally anticipated that these two test groups would be submitted in calendar year 2011, not 2010. The payment of \$1,750 for these two test groups was electronically paid today.

We respectfully request that the work continue for the issuance of the Certificates of Conformity for these two test groups.

Best regards,

Richard E. Thomas VOLKSWAGEN GROUP OF AMERICA, INC. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO) Phone: 248 754-4213

Fax: 248 754-4207 Richard.Thomas@VW.com

<b>\$</b> EPA	U.S. Environmental Protection Agency Motor Vehicle and Engine Compliance Program Miscellaneous Payments Due Form	
Date:	January 6, 2011	
Manufacturer Name:	VOLKSWAGEN Group of America, Inc.	
Engine Family Name:	C V W X V 0 2 . 0 3 P A	
Original Payment Date	E: Dec. 17, 2010 Original Check#/Wire/ACH/Pay.gov Tracking Number: 5200051791	(optional)
Original Amount Paid:		
Revised Engine Famile		
Company Represental	tive:	
Name:	Richard E. Thomas Phone: 248 754 4213	
Email Address:	Richard.Thomas@VW.com Fax:	(optional)
Reason for Payment:		_
☐ Incorrect/Re	evised engine family	
☑ Underpayme	ent .	
☐ New calenda	ar year fee schedule change	
☐ Component	certification for evaporative emissions (\$241)	
☐ Other		
Fee Payment Details		
Amount Paid:	\$ 875	
	number, or the statement "EFT/Wire" or "EFT/ACH":	
Submission of paym	nents and forms: nay be found and/or payments may be submitted online at <u>www.Pay.gov</u> .	
	Environmental Protection Agency Motor Vehicle and Engine Compliance Program P.O. Box 979032 St. Louis, MO 63197-9000	
(3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instructions, page 2) (4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (See Instructions, page 2.) (5) Forms not submitted under (1) and (2) above can be sent as e-mail attachments to Fees@epa.gov. Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).		

<b>≎</b> EPA	U.S. Environmental Protection Agency Motor Vehicle and Engine Compliance Program Miscellaneous Payments Due Form
Date:	January 6, 2011
Manufacturer Name:	VOLKSWAGEN Group of America, Inc.
Engine Family Name:	C V W X V 0 2 . 0 3 S A
Original Payment Date:	Dec. 17, 2010 Original Check#/Wire/ACH/Pay.gov Tracking Number: 5200051791 (optional)
Original Amount Paid:	\$ 33,974 (optional)
Revised Engine Family N	ame: (optional)
Company Representative	
Name:	Richard E. Thomas Phone: 248 754 4213
Email Address:	Richard.Thomas@VW.com Fax: (optional)
Reason for Payment:	
☐ Incorrect/Revis	ed engine family
☑ Underpayment	
	ear fee schedule change
•	tification for evaporative emissions (\$241)
Other Comments:	Application unexpectly was submitted the very last week in 2010 and certification fees paid based upon 2011
	cert fee rates creating a short fall of \$875.
Fee Payment Details	
Amount Paid:	\$ 875
Submission of paymen	be found and/or payments may be submitted online at www.Pay.gov.
	Environmental Protection Agency Motor Vehicle and Engine Compliance Program P.O. Box 979032 St. Louis, MO 63197-9000
<ul><li>(4) Transmit offline <u>EF</u></li><li>(5) Forms not submitte</li><li>Forms and payments s</li></ul>	T/Wire payments to the New York Federal Reserve Bank. (See Instructions, page 2)  T/ACH payments to the Federal Reserve Bank of Cleveland. (See Instructions, page 2.)  d under (1) and (2) above can be sent as e-mail attachments to Fees@epa.gov.  ent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms (e.g., Federal Express).

From: "Hart, Robert (VWoA)"

Sent: Thur 1/13/2011 8:23:24 PM

Subject: RE: audi cert

Hi Jim,

Any chance we'll get that one in the morning?

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, January 13, 2011 3:17 PM

To: Hart, Robert (VWoA) Subject: audi cert

Looks like there's 1 left. It s been going real slow this week.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Hart, Robert (VWoA)"

Sent: Thur 1/13/2011 8:37:40 PM

Subject: FW: audi cert

We have them all - THANKS Jim!!

**Bob Hart** 

From: Hart, Robert (VWoA)

Sent: Thursday, January 13, 2011 3:23 PM

To: 'Snyder.Jim@epamail.epa.gov'

Subject: RE: audi cert

Hi Jim,

Any chance we'll get that one in the morning?

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, January 13, 2011 3:17 PM

To: Hart, Robert (VWoA) Subject: audi cert

Looks like there's 1 left. It s been going real slow this week.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

Cc: "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com]

From: "Rodgers, William"

**Sent:** Wed 1/26/2011 1:28:41 PM

Subject: Audi - Application for certification CAD\_3UF

william.rodgers@vw.com

Hello Jim,

I have submitted the necessary fuel economy retests and Applications for the 2012 Audi test group CADXV03.03UF. You will also find submitted Certificate Requests for the two related EVAP groups.

This is a carryover test group with the addition of a new model, Audi A7 quattro, and EVAP family CADXR0140C7A. Note, the CSI sheet that Verify generated for this new EVAP family is not in the usual test order somehow.

Please let me know if you see something that needs attention.

Best regards,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael"

[michael.giles@vw.com]

From: "Rodgers, William"

**Sent:** Wed 1/26/2011 2:10:44 PM

Subject: Audi - Certificate request test group CADXV03.03UF / EVAP family CADXR0140C7A

william.rodgers@vw.com

Hi Jim,

Just for clarification, in the Certificate Request for the new EVAP family CADXR0140C7A I indicated that the ORVR had not been EPA approved. In fact, it was previously reviewed and approved for the 2011 Audi A8 EVAP family BADXR0155D4Q as noted in the ORVR Safety Application in Section 15 of the Certification Application. Please Let me know if I need to revise the Certificate request.

Thanks,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael"

[michael.giles@vw.com]
From: "Rodgers, William"

Sent: Thur 1/27/2011 6:31:46 PM
Subject: Volkswagen certificates requested

william.rodgers@vw.com

Hi Jim,

Thanks for your help in denying the previous certificate requests this morning. I have resubmitted the two requests and the revised Applications for Audi test group CADXV03.03UF, EVAP families CADXR0140B8Q and CADXR0140C7A.

The CSI for EVAP family CADXR0140C7A was revised to reflect corrected dyno coefficients.

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

Cc: "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com]

From: "Rodgers, William"

**Sent:** Thur 1/27/2011 7:56:19 PM

Subject: Volkswagen - Application submission for Test Group CADXJ02.03UB

william.rodgers@vw.com

Hello Jim,

We have submitted to Verify the manufacturer fuel economy retests needed for Audi test group CADXJ02.03UB.

The Application for Certification and the two certification requests, for EVAP families CADXR0140B8Q and CADXR0140C7A, have also been submitted for your review.

Best regards,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Mon 2/7/2011 7:50:03 PM VW Group: New Test Waiver Request for VW Test Group CVWXV06.3UA8		
Hello Jim,			
rieno simi,			
Just a "hea	ds up" for a new test waiver request.		
The Audi A8L has a new body for MY 2012. This particular version is equipped with a new 6.3l normally aspirated W12 engine and an eight speed automatic transmission.			
Best regard	ds,		
Bob Hart			
Robert Hart			
Engineering and Environmental Office			
Volkswage	Volkswagen Group of America, Inc.		
3800 Hamlin Road			
Auburn Hil	ls, MI 48326		
Phone: (24	Phone: (248) 754-4224		
Fax: (248) 754-4207			
E-mail: robert.hart@vw.com			

From: Ex. 7

**Sent:** Mon 2/7/2011 9:44:56 PM

Subject: Recent Submission RE: SCR and AECD

Hello Jim:

Just a heads-up. I have submitted a document through VERIFY that is a request for approval of a diesel SCR system and description of AECDs. This document applies to the 2.0L TDI diesel that will be in the new Passat for 2012MY. You may recall that the 2,0L TDI in the Golf/Jetta uses a NOx storage catalyst (w/o SCR) and the 3.0L V6 TDI in the VW Touareg and Audi Q7, uses SCR. So, this is our first 2.0L TDI using an SCR system.

Please let me know if there are any questions. We will have some folks from Germany in the US next week if we need to discuss this topic.

Best regards,



Volkswagen Group of America, Inc.

Ex. 7

From: "Hart, Robert (VWoA)"  Sent: Tue 2/8/2011 3:45:30 PM  Subject: RE: VW Group: New Test Waiver Request for VW Test Group CVWXV06.3UA8		
Hello Jim,		
The "heads up" was a little premature. Some yet undiscovered problem with the Verify System has rejected submission. I am waiting for a solution from the helpdesk.		
Best regards,		
Bob Hart		
From: Hart, Robert (VWoA) Sent: Monday, February 07, 2011 2:50 PM To: 'Snyder.Jim@epamail.epa.gov' Subject: VW Group: New Test Waiver Request for VW Test Group CVWXV06.3UA8		
Hello Jim,		
Just a "heads up" for a new test waiver request.		
The Audi A8L has a new body for MY 2012. This particular version is equipped with a new 6.3I normally aspirated W12 engine and an eight speed automatic transmission.		
Best regards,		
Bob Hart		
Robert Hart		

1

To:

Jim Snyder/AA/USEPA/US@EPA[]

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com] From: "Giles, Michael"
Sent: Thur 2/17/2011 3:26:01 PM Subject: VW - Revisions to MY 2010 Audi Final applications
Hello Jim,
Today we uploaded revisions of the final applications for a total of five MY2010 Audi test groups. These revisions had an update to the parts list in section 21.
Updated CBI and FO final applications were uploaded for the following test groups:
AADXJ03.23UC
AADXV02.03PA
AADXV02.03UA
AADXV02.03UB
AADXV03.03UF
Please contact me if you have any questions.
Regards,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael"

[michael.giles@vw.com]

From: "Rodgers, William"

**Sent:** Fri 2/25/2011 7:38:06 PM

**Subject:** VW Group - CVWXV03.6U41 submittals

william.rodgers@vw.com

Hi Jim,

I have submitted Test Information and Decision Information to Verify for the above mentioned test group. This represents the 3.6L VR6 (Bin 5 / ULEV-II) version of the 2012 Passat, already certified with the 2.5L 5-cylinder engine. The test group includes one vehicle configuration using existing technology 3.6L VR6 engine and 6-speed Front-drive DSG transmission, however this is the first model available with this engine/transmission combination. The EVAP family is a carryover from the previous model year VW Passat. This new test group will also be included in VW Group's Cold NMHC compliance phase-in for 2012.

Please let me know if you have any questions.

Thanks,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

From: "Rodgers, William"

**Sent:** Mon 2/28/2011 3:21:09 PM **Subject:** VW Group - BVWXV03.6U41

william.rodgers@vw.com

Hi Jim,

The Supplemental Information has been submitted for the following vehicle selected for confirmatory testing:

VW Passat 3.6L

Vehicle ID: 411 10206 /12

Bill Rodgers

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

To: From:	Jim Snyder/AA/USEPA/US@EPA[] Ex. 7
Sent:	Thur 3/3/2011 9:28:39 PM
Subje	ct: RE: VW Request for Approval - SCR and AECD
Jim –	
Okay, t	chanks for checking.
Ev	. 7
EX	<u>. /</u> ]
_	
Sent: T	Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov] hursday, March 03, 2011 1:39 PM
To:	Ex. 7 t: Re: VW Request for Approval - SCR and AECD
,	
Ev 7	
and go	I saw your note and I haven't forgotten. I gave it a quick look but I need to set aside some time through it . I will make it a point to complete my evaluation of it next week.
Jim Sny	yder
	Outy Vehicle Group iance and Innovative Strategies Division
United	States Environmental Protection Agency
	:14-4946 .jim@epa.gov
From:	Ev 7
<b>-</b>	Ex. 7
To:	Jim Snyder/AA/USEPA/US@EPA
Date:	
	03/03/2011 10:48 AM
Subjec	
	VW Request for Approval - SCR and AECD

## Hello Jim:

In mid-February I submitted a document that describes the SCR system in the 2012 New Passat with 2.0L TDI Diesel. The document also contains information about AECDs for this engine concept. This is the mid-size sedan vehicle that will be produced beginning in late April in the new plant in Chattanooga, TN.

I was wondering whether you have had a chance to look at the information and if you find it acceptable or have further questions or concerns.

Please let me know.

Best regards,

**Ex.** 7

Volkswagen Group of America, Inc.

**Ex.** 7

To: Cc: [Robert.Ha From:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" art@vw.com] "Giles, Michael"
Sent: Subject:	Tue 3/8/2011 2:31:50 PM VWGoA Revised application submitted CNLXV06.5L83
Hello Jim,	
	s up that we have submitted a revised application today for a running change (related to new d model name change). This is for Lamborghini test group CNLXV06.5L83. We are requesting a tificate.
Please let n	ne know if you have any questions on this.
Regards,	
Mike	
Michael Gil	es
Certificatio	n Specialist
Engineering	g and Environmental Office
Volkswager	n Group of America, Inc.
3800 Haml	in Road
Auburn Hill	s, MI 48326
United Stat	res of America
Phone +1-2	48-754-4229

From: "Rodgers, William"

**Sent:** Wed 3/9/2011 12:52:10 PM

Subject: RE: VW Group Decision Information submissions for TG: CVWXV02.03PA

william.rodgers@vw.com

Thanks Jim.

We have a test QA process that flags any manufacturer retests necessary based on the current EPA parameters. We will always try to mention them to you for your confirmatory test decision information.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, March 08, 2011 5:50 PM

To: Rodgers, William

Subject: Re: VW Group Decision Information submissions for TG: CVWXV02.03PA

Thanks, yes I saw the highway test flagged. Glad to read that you plan to test it. I was going to wait and see if you did it.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Rodgers, William" < William.Rodgers@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

03/08/2011 02:57 PM

Subject:

VW Group Decision Information submissions for TG: CVWXV02.03PA

## Hi Jim,

We submitted today two Decision Information data sets for test group CVWXV02.03PA. These are related to a forthcoming Running Change to add the Jetta model to this existing Bin 3/ SULEV (PZEV) test group. No new technology is included with this model. The manual transmission configuration does require a HWY retest do to high fuel economy for the ETW.

Vehicle ID: VW361 00464 (Jetta manual trans) VW465 00127 (Jetta automatic trans)

Best regards,

Bill Rodgers
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI United States (248) 754-4219 (248) 754-4207 william.rodgers@vw.com

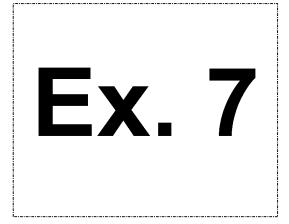
To:	Jim Snyder/A	A/USEPA/US@EPA[]	
Cc:	<u> </u>	Ex. 7	
į l	Ex. 7		
From:	Ex. 7		
Sent:	Wed 3/9/201	1 4:39:26 PM	
Subject:	VWGoA - Fie	eld Fix documents for MY 2004 test groups 4VWXV2.0234	
4VWXV01.9236			
CBL 4\/W	XV/02 0234 A	PP F04 R00 PDF	

Hello Jim,

Today we prepared two field fix letters which we could not upload through Verify. The problem is that they are for MY 2004, whereas list in Verify only goes to 2005 (I am told Verify previously had earlier MY available). So instead of using Verify, I am sending the documents to you as PDF attachments in this email.

If there is a better way to handle this should it occur in the future, please let me know.

## Regards,



CBI 4VWXV01.9236 APP F10 R00.PDF

Volkswagen Group of America, Inc.



## Ex. 7

To: Cc: [Robert Ha	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" art@vw.com]
From:	"Giles, Michael"
Sent: Subject:	Thur 3/10/2011 9:12:11 PM VWGoA Decision Information Submitted
Hello lim	
richo Jiri,	
CADXJ02.03	dded a new model (Jetta GLI, both automatic and manual configurations) for test group 3UA. This test group is a carryover test group and has already been certified. A running change submitted for the addition of the new model.
We have al	ready submitted vehicle information, test data and Decision Information for both
transmissio	ons of this model. Note, this model is not a new worst case vehicle and has no new technology
	e, one manufacturer re-test is required (for the automatic configuration: HWFE / High FE for
EIW).	
	greatly appreciate your response on this as soon as possible. Please let me know if you have ons regarding this submission.
, .	
Dogords	
Mike	
Michael Gil	les
Certificatio	n Specialist
Engineering	g and Environmental Office
Volkswager	n Group of America, Inc.
3800 Hamli	in Road
Auburn Hill	ls, MI 48326
United Stat	tes of America
	Cc: [Robert.Harmon: Sent: Sent: Subject:  Hello Jim,  We have an CADXJ02.0 will also be served and transmission of the complete of the complet

To: Cc: [Robert.Ha From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" art@vw.com] "Giles, Michael" Mon 3/14/2011 1:21:26 PM RE: VWGoA Decision Information Submitted
Hello Jim,	
Just to con help.	firm, we did receive the waiver confirmation for this Friday afternoon. Thanks again for your
of a new ca	ne item I need to clarify – the running change that will be submitted is because of the addition arline (Beetle). I just wanted to clarify that detail since the Jetta GLI will remain in the Jetta a carryover. I had misunderstood this Friday when we talked.
Regards,	
Mike	
Michael Gi	les
Certificatio	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	ls, MI 48326
United Stat	tes of America
Phone +1-2	248-754-4229

From: Giles, Michael Sent: Thursday, March 10, 2011 4:12 PM To: Snyder, Jim
Cc: Rodgers, William; Hart, Robert (VWoA) Subject: VWGoA Decision Information Submitted
Hello Jim,
We have added a new model (Jetta GLI, both automatic and manual configurations) for test group CADXJ02.03UA This test group is a carryover test group and has already been certified. A running change will also be submitted for the addition of the new model.
We have already submitted vehicle information, test data and Decision Information for both transmissions of this model. Note, this model is not a new worst case vehicle and has no new technology.
Please note, one manufacturer re-test is required (for the automatic configuration: HWFE / High FE for ETW).
We would greatly appreciate your response on this as soon as possible. Please let me know if you have any questions regarding this submission.
Regards,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

From: "Rodgers, William"

**Sent:** Mon 3/14/2011 3:38:01 PM

Subject: VW Group \_ 3-03-2011 Certificate request for TG CVWXV02.03PA

william.rodgers@vw.com

Jim,

I wanted to alert you to a revision I am making to a CARLINE name found in the Section 7 CSI for Test group: CVWXV02.03PA, Evap family CVWXR0110D37. This will affect the Certificate requested on 3/11/11.

The carline New Beetle has been changed to "Beetle" and should appear on the Certificate as such.

A revised application is in process and will be submitted this morning.

Regards,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

Jim Snyder/AA/USEPA/US@EPA To: Ex. 7 @arb.ca.gov>[]

From:

Sent: Wed 3/16/2011 7:03:17 PM

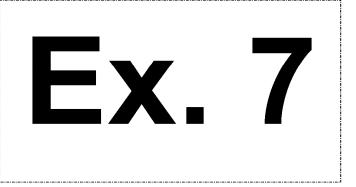
2.0L TDI - Volkswagen Requests for Approval Subject:

Hello Jim and Ex. 7

Just a heads-up. I have submitted a request for approval of the upward and downward DPF regeneration adjustment factors for the 2012 model year 2.0L TDI test group CVWXV02.0U4S. The request was submitted to EPA and ARB through VERIFY and DMS respectively. These factors are determined as we have done so in the past for our DPF-equipped diesels.

Your attention to this matter would be appreciated. I would also appreciate an update on the status of the review of the SCR/AECD submittal for this test group.

Best regards,



Volkswagen Group of America, Inc.

To: Jim Snyder/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA[]; rvon

Mitcham/AA/USEPA/US@EPA[]

From: Ex. 7

Sent: Wed 3/16/2011 10:09:43 PM
Subject: Lamborghini Bench Cycle Request

Hello Jim and Arvon:

I wish to inform you that I have submitted, via VERIFY, a request for approval of a Lamborghini Bench Cycle. The cycle would be used for their V12 engine concept. The technical information is provided in the form of a slide presentation. If there are any questions, I can forward these back to Lamborghini. Further, Lamborghini technical staff is available to participate in a telephone conference if there are any detailed questions. I can easily set this up.

There is some urgency associated with the request for approval, so your attention to this matter would be appreciated.

Best regards,

Ex. 7

P.S. Arvon – I assumed that you are still involved in this topic, but if I am not correct, please let me know.

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

Ex. 7

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com] From: "Giles, Michael"
Sent: Thur 3/17/2011 11:31:21 AM Subject: Lamborghini Revised Certificate Request - CNLXV06.5L83
Hello Jim,
As a follow up to our discussion, I have submitted a request for a "new" certificate for the above test group (although it should be a revision - "new" was the only option).
Please let me know if you received this, since I have not received a confirmation email .
To summarize the reasons for the revised certificate request:
1) Name change from 834 to Aventador
2) New catalyst configuration (there will now be both 4 and 6 catalysts configurations).
Thanks for your help, please call me if you have any questions.
Thanks,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America

1

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Cc: [Robert.H From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" art@vw.com] "Giles, Michael" Thur 3/17/2011 7:14:47 PM
Subject:	VW Group - Running Change and Revised Certificate request for CADXJ02.03UA
Hello Jim,	
Today I ha CADXJ02.0	ve submitted the following items related to the addition of the Beetle to test group I3UA:
1) Runn	ing change letter for addition of Beetle model (carline) to the test group.
2) Revis	ed application document
	request for certificate for combination of test group CADXJ02.03UA and evaporative family 0238 (note that the current certificate number is CADXJ021.03UA-002).
Please con	tact me if you have any questions.
Regards,	
Mike	
Michael Gi	iles
Certification	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Ham	lin Road
Auburn Hil	lls, MI 48326
United Sta	tes of America
Phone +1-	248-754-4229

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]

From: "Giles, Michael (EEO)"
Sent: Wed 6/20/2012 12:07:16 PM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

snyder.jim@epa.gov michael.giles@vw.com mailto:Snyder.Jim@epamail.epa.gov snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

Hi Jim,

I just checked our copy of the MY 2013 pre-certification document, and did not see any mention of plug in (looking at the table of page 10). The vehicle is clearly described a standard HEV in our data set we received.

If you do have a plug in described, can you tell me where so we can resolve or correct if necessary?

Thanks

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:46 PM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Are you positive? The cert preview document lists this vehicle and test group as a 1.4L TFSI with plugin hybrid technology. Did they change it since October?

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 06/19/2012 04:38 PM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

No plug in, I believe it is a standard "HEV" because there is no outside power source other than the fuel.

The available date is September 17th.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:33 PM

To: Giles, Michael (EEO) Cc: Rodgers, William (EEO)

Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

Is this a plug-in hybrid? When will it be available for testing?

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/19/2012 03:45 PM

Subject: VW Group - Decision Info 1.4L Jetta Hybrid

Hello Jim,

I just submitted a decision request for the new 1.4L Jetta Hybrid (1.4L), for test group DVXXV01.4PHE.

This vehicle has new technology all around (engine, evaporative family, OBD system, ORVR system). Our understanding is that EPA will most likely want to do confirmatory tests.

Please let me know if you have any questions processing this request.

Thanks,

## Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: "Giles, Michael (EEO)" [michael.giles@vw.com]; im Snyder/AA/USEPA/US@EPA[]

**From:** "Rodgers, William (EEO)" **Sent:** Wed 6/20/2012 12:26:35 PM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

[mailto:Snyder.Jim@epamail.epa.gov]

snyder.jim@epa.gov michael.giles@vw.com

mailto:Snyder.Jim@epamail.epa.gov

snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

Sorry for the confusion guys. The Certification Preview cover letter (I created) did describe it as a plug-in hybrid as originally planned, however those plans have been delayed. The 2013 model year vehicle is not a plug in.

**Bill Rodgers** 

**Emissions Certification Specialist** 

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

From: Giles, Michael (EEO)

Sent: Wednesday, June 20, 2012 8:07 AM

To: Jim Snyder

Cc: Rodgers, William (EEO)

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

I just checked our copy of the MY 2013 pre-certification document, and did not see any mention of plug in (looking at the table of page 10). The vehicle is clearly described a standard HEV in our data set we received.

If you do have a plug in described, can you tell me where so we can resolve or correct if necessary?

**Thanks** 

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:46 PM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Are you positive? The cert preview document lists this vehicle and test group as a 1.4L TFSI with plug-in hybrid technology . Did they change it since October?

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 06/19/2012 04:38 PM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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The available date is September 17th.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:33 PM

To: Giles, Michael (EEO) Cc: Rodgers, William (EEO) Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

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To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/19/2012 03:45 PM

Subject: VW Group - Decision Info 1.4L Jetta Hybrid

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FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"
Sent: Wed 6/20/2012 12:55:59 PM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com mailto:Snyder.Jim@epamail.epa.gov snyder.jim@epa.gov

michael.giles@vw.com mailto:Snyder.Jim@epamail.epa.gov

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Jim,

I will input the evaporative tests soon, sorry about the omission.

Regards

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 20, 2012 8:24 AM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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Compliance Division

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snyder.jim@epa.gov

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To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/20/2012 08:14 AM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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To: Cc: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com] "Giles, Michael (EEO)" Wed 6/20/2012 1:32:38 PM RE: VW Group - Decision Info 1.4L Jetta Hybrid
snyder.jir michael.g William.R mailto:Sn snyder.jir	nyder.Jim@epamail.epa.gov] n@epa.gov illes@vw.com odgers@vw.com yder.Jim@epamail.epa.gov n@epa.gov
mailto:Sn snyder.jir michael.c	illes@vw.com yder.Jim@epamail.epa.gov n@epa.gov illes@vw.com odgers@vw.com
Hi Jim,	
	on information for the Jetta Hybrid has been corrected to include the evaporative tests, as well onal supporting FTP tests.
Sorry abou	ut the omission, I was under the idea that the d.i. was relevant only for exhaust tests.
Regards,	
Mike	
Sent: Wed To: 'Jim Sr	s, Michael (EEO) nesday, June 20, 2012 8:56 AM nyder' E: VW Group - Decision Info 1.4L Jetta Hybrid
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1

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United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: richard.thomas@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Wed 6/20/2012 5:32:45 PM

Subject: re: 2013 FE Guide - data in Verify as of 6/15/2012 attached; some have errors

VW Group-2013 FEGuide-rel10-all-rel-dates-no-sales-6-15-2012.xlsx

Richard,

Attached is a spreadsheet with all the 2013 FE Label data in Verify as of 6/15/2012.

The data highlighted in green have errors. Please correct the errors when you get a chance.

Note that I'm still sending releasable error-free data to DOE for posting on www.fueleconomy.gov on the 1st and 15th of the month.

Thanks

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Giles, Michael (EEO)"

[michael.giles@vw.com]; erify Help Desk [verifyhelp@csc.com]

**From:** "Rodgers, William (EEO)" **Sent:** Thur 6/21/2012 12:04:27 PM

Subject: FW: 2012 Volkswagen Index Derived 5-cycle and Litmus (HLP-2668)

VW351 780169-09.pdf

9VWX09009738 EPA US06.xml

Hello Jim,

The attached US06 EPA confirmatory test only includes one Fuel Economy bag result instead of the required two bags and is preventing the Verify system from calculating a litmus value.

This issue is preventing us from submitting fuel economy labels in Verify for 8 different 2013 models, soon to be introduced to the market.

Please investigate how to correct this issue as soon as possible and let us know if our involvement is needed.

Regards,

Bill Rodgers

**Emissions Certification Specialist** 

VOLKSWAGEN GROUP OF AMERICA, INC. Engineering and Environmental Office Auburn Hills, MI (248) 754-4219 william.rodgers@vw.com

-----Original Message-----From: Thomas, Richard (EEO)

Sent: Thursday, June 21, 2012 6:06 AM

To: Giles, Michael (EEO); Rodgers, William (EEO)

Subject: FW: 2012 Volkswagen Index Derived 5-cycle and Litmus (HLP-2668)

Importance: High

More corrections for the 2.0L TDI test group requiring a new certificate.

----Original Message-----

From: @csc.com] On Behalf Of Verify Help Desk

Sent: Wednesday, June 20, 2012 6:27 PM

To: Thomas, Richard (EEO)

Subject: Re: 2012 Volkswagen Index Derived 5-cycle and Litmus (HLP-2668)

Hello Mr. Thomas,

Business rule LD-FE-GL-BR119 was returned with your fuel economy label submission because the EPA Highway Litmus Value was not calculated for the Test Group DVWXV02.0U5N. The reason that the EPA Highway Litmus Value was not calculated is because the Test Information Number 9VWX09009738 does not contain a test result for FE BAG 2 (Bag 2 Fuel Economy) which is used in the calculations.

In order to have the EPA Highway Litmus Value calculated you will need to make a Correction for Test

#9VWX09009738 and be sure to add an emission result for FE BAG 2 (Bag 2 Fuel Economy). If you do not have access to the test information submission file you may request a test information dataset report to see the data that should be entered for the Correction. To request a dataset report navigate to: MyCDX > Light-Duty Vehicle & Truck > Vehicle, Fuel Properties, & Tests > Request Dataset Report (in Test Information section).

You will then need to make a Correction to your test group in order for the calculation to be made and for you to see the EPA Highway Litmus Value on your CSI.

After the test group submission is accepted, please make a lock request and answer "Yes" to the question "New Certificate Needed?" You can also add a comment in the comment box above this question that you are requesting a revised certificate for your fuel economy submission.

Please contact your EPA Cert Rep and have them issue the revised certificate.

Please try your fuel economy label submission again and let me know if it is accepted.

Ex. 6

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

Verify Help Desk
Sent by: Ex. 6

Ex. 6

"Thomas, Richard (EEO)"

<Richard.Thomas@vw.com>
06/20/2012 11:49

CC

AM

Subject

Re: 2012 Volkswagen Index Derived

5-cycle and Litmus(Document link:

Verify Help Desk)

Hello Mr. Thomas,

We are still looking into this issue. It does appear that you are correct.

Verify did not calculate the EPA Highway Litmus value. We will let you know soon what is required for Verify to do

Ex. 6

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

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"Thomas, Richard (EEO)"

<Richard.Thomas@v To
w.com> Verify Help Desk@CSC
cc
06/19/2012 02:17
PM Subject

2012 Volkswagen Index Derived 5-cycle and Litmus

Hello Ex. 6

I am having difficulty with a number of Diesel concept derived 5-cycle labels due to the following error. The test group DVWXV02.0U5N and CSI information report has no "EPA Highway Litmus Value. I think that may be the cause of the following business rule message.

**Transaction Status Details** 

Transaction Status Identifier: REJECTED Transaction Message Text: LD-FE-GL-BR119 - If Fuel Economy Label Calculation Approach (GL-79) is equal to '5C-DRV' (Derived 5-cycle), and MDPV-Only or ICI Indicator (GL-200) equals 'N' (No), and the Test Group

(GL-126) specified in the subconfiguration sales section contains a Test Group Fuel (TG-217.1) equal to 'G' (Gasoline) or 'D' (Diesel), then Test Group (GL-126) must have valid values (non-Null) for EPA City Litmus Value (TG-219.3.1), EPA City Litmus Threshold (TG-219.3.2), EPA Highway Litmus Value (TG-219.4.1), and EPA Highway Litmus Threshold (TG-219.4.2), and EPA City Litmus Value (TG-219.3.1) must be greater than or equal to EPA City Litmus Threshold (TG-219.3.2), and EPA Highway Litmus Value (TG-219.4.1) must be greater than or equal to EPA Highway Litmus Threshold (TG-219.4.2).

(Base Level IWC = 3500) (Config Index = 1) (SubConfig Index = 1) (Test Group (GL-126) = DVWXV02.0U5N)

Transaction Identifier: \_a784ac70-de02-4aca-870a-d094bd36e386

I have several derived 5-cycle Diesel labels that are in this test group and I need to resolve this as soon as possible.

Best regards, Richard

- <?xml version="1.0" encoding="UTF-8"?>
- <?xml-stylesheet type="text/xsl" href="https://cdxnodengn.epa.gov/verify/xslt/processing\_report.xslt"?>
- <TestInformationSubmission xmlns="urn:us:net:exchangenetwork:Verify">
- <TestInformationDetails>
- <InformationProcessCode>C</InformationProcessCode>
- <TestNumberIdentifier>9VWX09009738</TestNumberIdentifier>
- <EPAManufacturerCode>VWX</EPAManufacturerCode>
- <VehicleIdentificationText>VW351 780169/09</VehicleIdentificationText>
- <VehicleConfigurationNumber>2</VehicleConfigurationNumber>
- <TestDataDetails>
- <TestDate>20080520</TestDate>
- <TestLaboratorySiteCode>1</TestLaboratorySiteCode>
- <TestProcedureIdentifier>90</TestProcedureIdentifier>
- <TestFuelTypeIdentifier>19</TestFuelTypeIdentifier>
- <OdometerStartValue>4413</OdometerStartValue>
- <CorrectionUnitsCode>M</CorrectionUnitsCode>
- <AnalyticallyDerivedIndicator>N</AnalyticallyDerivedIndicator>
- <FourWheelDriveDynamometerIndicator>N</FourWheelDriveDynamometerIndicator>
- <EPADynamometerNumberText>D329</EPADynamometerNumberText>
- <DieselAdjustmentFactorUsageIndicator>U</DieselAdjustmentFactorUsageIndicator>
- <ManufacturerCommentText>THIS TEST HAS PARTICULATE RESULTS. [NMOG=NMHC] TSD-LCS TEST#: (8) 13-6003,
- EPA FE Calc Rel8</ManufacturerCommentText>
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- </TestDataDetails>
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- <TestFuelCategoryIdentifier>D</TestFuelCategoryIdentifier>
- <Test5CycleCategoryIdentifier>US06</Test5CycleCategoryIdentifier>
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- </TestInformationSubmission>



## United States Environmental Protection Agency

## **NVFEL**

Ann Arbor, Michigan 48105

FAX TO: Len Kata

FAX NUMBER: 248 754-4207 PHONE NUMBER: 1248 754-4204

LOCATION: Volkswagen Engineering & Environmental Office

FROM: Bruce Sdunck

**FAX NUMBER:** 734 214 4869 PHONE NUMBER: 734 214 4733

**DIVISION:** Certification & Compliance Division

**DATE:** May 21, 2008 PAGE <u>1</u> of <u>13</u> PAGES

MESSAGE: Len,

Here are the preliminary results for the VW Diesel.

Bruce Sdunek

Certification and Compliance Division

Environmental Protection Agency

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PAGE LOF 13 PAGES

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-			NVFE	L Laboratory Te	est Data			cvs
				ults- Refer to CFE	IS Reports fo			
	<b></b>		2008-0136-001	I			VW351 780169	
est Information		Test Date:					VOLKSWAGE	٧
UMITED STATES	Key S	tart / Hot Soak:		2		MFR Code:	590	
		Operator:				Config #:	00	
	Fue	el Container ID:				Transmission:	AUTO	
الله الله الله		Fuel Type:	19 2007 Cert D	lesel (8-12 ppm Su	alfur)	Shift Schedule:	A09980005	
The series	Т	est Procedure:	02 CVS 75-Lat	er (w/o Can Load)	(ftp3bag)	Ödometer:	004377.0 MI	
PROTE	Calci	ulation Method:	Diesel			Drive Schedule:	ftp3bad	
	Pro	etest Remarks:				Soak Period:		
Quality Control:	(	QC Exceptions t	nave been identi	fied and noted				
Bag Data		THC / IntTHC	CO	<u>NOx</u>	ÇO2	CH4	NonMeth HC	
hase 1		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	<del>)</del>	8,926 / 8,956	21.079	0.672	0.744	5.908		
Ambient		2.266	0.264	0.008	0.045	1.914		
Vet Concentration	1	6.786 / 6.817	20.830	0.665	0.702	4.101	1.982	
	Remarke: F	Filt A Excluded f	rom Mahta					
hase 2	. tomanto. <u>L</u>	THE PARTY OF T	STI THING					
Sample	<b>;</b>	3.505 / 3,435	0.373	0.026	0.467	2.999		
Amblent		2.226	0.091	0.004	0.043	2,999 1,901		-
Net Concentration		1.357 / 1,286	0.284	0.022	0.425	1,165	-0.087	Warnino
			5.25	U.UZZ	0,720	1,100	100,007	vvaming
Phase 3 Sample Ambient Net Concentration Phase 4	; ;	Filt A Excluded fi 3.003 / 2.915 2.333 0.782 / 0.694	0.411 0.076 0.339	0.197 0.005 0.192	0.644 0.042 0.603	2.553 1.920 0.725	-0.160	Warning
Sample Ambient let Concentration	t							
	Remarks: I	This test has par	ticulate results.					
esults.				NIÓ	COR	Olid	KIERIA	
Results		THC / IntTHC	<u>co</u>	NQx (cpm)	CO2	ÇH4 (com)	NMHC (com)	Vol MPG
Results		THC / IntTHC (gpm)	<u>CQ</u> (gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
esults	Phase 1	THC / IntTHC (gpm) - / 0.087	<u>CQ</u> (gpm) 0.539	(gpm) 0.025	(gpm) 285.2	(gpm) 0.061	(gpm) 0.025	(mpg) 35.364
esults	Phase 1 Phase 2	THC / IntTHC (gpm) - / 0.087 - / 0.026	<u>CQ</u> (gpm) 0.539 0.012	(gpm) 0.025 0.001	(gpm) 285.2 276.6	(gpm) 0.061 0,028	(gpm) 0.025 0,000	(mpg) 35.364 36,588
lesults	Phase 1	THC / IntTHC (gpm) - / 0.087	<u>CQ</u> (gpm) 0.539	(gpm) 0.025	(gpm) 285.2	(gpm) 0.061	(gpm) 0.025	(mpg) 35.364 36,588
Results	Phase 1 Phase 2	THC / IntTHC (gpm) - / 0.087 - / 0.026	<u>CQ</u> (gpm) 0.539 0.012	(gpm) 0.025 0.001	(gpm) 285.2 276.6	(gpm) 0.061 0,028	(gpm) 0.025 0,000 0.000	(mpg) 35.364 36,588
	Phase 1 Phase 2	THC / IntTHC (gpm) - / 0.087 - / 0.026	<u>CQ</u> (gpm) 0.539 0.012	(gpm) 0.025 0.001	(gpm) 285.2 275.6 244.6	(gpm) 0.061 0.028 0.011	(gpm) 0.025 0.000 0.000 <nmog=nmhc></nmog=nmhc>	(mpg) 35.364 36,588
	Phase 1 Phase 2 Phase 3	THC / IntTHC (gpm) - / 0.087 - / 0.026 - / 0.009	<u>CO</u> (gpm) 0.539 0,012 0.009	(gpm) 0.025 0.001 0.007	(gpm) 285.2 276.6	(gpm) 0.061 0.028 0.011	(gpm) 0.025 0,000 0.000 <nmog=nmhc> 0,00527</nmog=nmhc>	(mpg) 35.364 36,588 41.388
	Phase 1 Phase 2 Phase 3	THC / IntTHC (gpm) - / 0.087 - / 0.026 - / 0.009	<u>CO</u> (gpm) 0.539 0,012 0.009	(gpm) 0.025 0.001 0.007	(gpm) 285.2 275.6 244.6	(gpm) 0.061 0.028 0.011	(gpm) 0.025 0,000 0.000 <nmog=nmhc> 0,00527</nmog=nmhc>	(mpg) 35.364 36.588 41.388
	Phase 1 Phase 2 Phase 3 Weighted	THC / IntTHC (gpm) - / 0.087 - / 0.026 - / 0.009  0.03421 Diesel MPG 35.54	<u>CO</u> (gpm) 0.539 0,012 0.009	(gpm) 0.025 0.001 0.007	(gpm) 285.2 275.6 244.6	(gpm) 0.061 0.028 0.011	(gpm) 0.025 0.000 0.000 <nmog=nmhc> 0.00527 Dyno #:</nmog=nmhc>	(mpg) 35.364 36,588 41.388 D329 3750
	Phase 1 Phase 2 Phase 3 Weighted Phase 1 Phase 2	THC / IntTHC (gpm) - / 0.087 - / 0.026 - / 0.009  0.03421 Diesel MPG 35.54 36.77	<u>CO</u> (gpm) 0.539 0,012 0.009	(gpm) 0.025 0.001 0.007	(gpm) 285.2 275.6 244.6	(gpm) 0.061 0.028 0.011	(gpm) 0.025 0.000 0.000 <nmog=nmhc> 0.00527 Dyno #: Inertis: EPA Set Co A</nmog=nmhc>	(mpg) 35.364 36,588 41.388 D329 3750 : 18.38
	Phase 1 Phase 2 Phase 3 Weighted	THC / IntTHC (gpm) - / 0.087 - / 0.026 - / 0.009  0.03421 Diesel MPG 35.54	<u>CO</u> (gpm) 0.539 0,012 0.009	(gpm) 0.025 0.001 0.007	(gpm) 285.2 275.6 244.6	(gpm) 0.061 0.028 0.011	(gpm) 0.025 0.000 0.000 <nmog=nmhc> 0.00527  Dyno #: Inertia: EPA Set Co A EPA Set Co B</nmog=nmhc>	(mpg) 35.364 36.588 41.388 D329 3750 : 18.38 : -0.1203
	Phase 1 Phase 2 Phase 3 Weighted Phase 1 Phase 2	THC / IntTHC (gpm) - / 0.087 - / 0.026 - / 0.009  0.03421 Diesel MPG 35.54 36.77	<u>CO</u> (gpm) 0.539 0,012 0.009	(gpm) 0.025 0.001 0.007	(gpm) 285.2 275.6 244.6	(gpm) 0.061 0.028 0.011 0.02985 Dyno Settings	(gpm) 0.025 0.000 0.000 <nmog=nmhc> 0.00527  Dyno #: Inertia: EPA Set Co A EPA Set Co B EPA Set Co C</nmog=nmhc>	(mpg) 35.364 36.588 41.388 41.388 2750 18.38 20.1203 30.02109
	Phase 1 Phase 2 Phase 3 Weighted Phase 1 Phase 2	THC / IntTHC (gpm) - / 0.087 - / 0.026 - / 0.009  0.03421 Diesel MPG 35.54 36.77	<u>CO</u> (gpm) 0.539 0,012 0.009	(gpm) 0.025 0.001 0.007	(gpm) 285.2 275.6 244.6	(gpm) 0.061 0.028 0.011  0.02985  Dyno Settings	(gpm) 0.025 0.000 0.000 <nmog=nmhc> 0.00527  Dyno #: Inertia: EPA Set Co A EPA Set Co B</nmog=nmhc>	(mpg) 35.364 36.588 41.388 D329 3750 : 18.38 : -0.1203 : 0.02109 35 / 35 / 35

			NVFEL	Laboratory T	est Data			CVS
		Test Number: 2	tory 1951 Kesi 008-0136-001	ults- Refer to CF	EIS Reports for (		VW351 780169	2/00
lesults		THC / IntTHC	CO	NOx	CO2	CH4		
THITED BYAZE		(grama)	(grams)	(grams)			NMHC	Meth Respons
Chill St.	Phase 1	- / 0.313	1.930	0.090	(grams)	(grams)	(grams)	1,179
<b>के कि टि</b>	Phase 2	- / 0.101 - / 0.101	0.045	0.005	1021.5	0.218	0.091	
	Phase 3	- / 0.032	0.031		1060.3	0.108	0.000	
MATAL PROTECTION	Phase 4	- / 0.032	0.031	0.026	876.4	0.038	0,000	
est Conditions		•	Phase 1	Phase 2	Phase 3	Phase 4		
	E	Barometer (InHg)	28.67	28.67	28.66	<u>- 11200 7</u>		
		Cell Temp (degF)	71.70	71.76	71.67			
		Dew Point (degF)	47,54	46.90	46.20			
St		dity (grains/lbm)	50.95	49.72	48.41			
Op.		NOx Corr Factor	0,8984	0.8938				
		2 Dilution Factor	17.946		0,8889			
				28,693	20.806			
		/mix (scf @68F)	2787.69	4773.81	2780.80			
	lotai	Vmlx (scf@68F)	2809.90	4812.04	2803.01			
CV		Rate Avg (scfm) Flow Avg (scfm)	330.29	329.27	329.15			
		Fan Placement: O	na Ean Ilo I	Frant				
	Dh	ase Time (secs)	506.40	869.90	F0C 65			
					506.90			
		Distance (miles)	3.582	3.833	3.583			
Date O		ysis Time (secs)	950.4	147.9	89.3	OK	05-21-08	
Data Qu	ality Flags				15 Check	$\leq$ $-\mu$		
		QC Exceptions have		ed and noted	, –		the and	50 miles
		QC EXCEPTION:	-PSU A Excep	tion   - \   -   +	3.583 89.3 /S Check r A is exc	luded as	242011 1th	१८।१४/८ वर्ष
MFR Te	est Results	for Procedure 2 C	VS 75 AND LA	TER (W/O CAN.	LOAD)	1		
MF	R Number	<u>HÇ</u>	<u>co</u>	<u>NOx</u>	<u> CO2</u>	<u>NMOG</u>	NonMeth HC	
	1084705	0.0437	0.02	0.022	274	0	0.0034	
1	<u>Odometer</u>	MPG			MFR Lab:	Volkswagen AG,	Dept, E/TZ-TZ	
	4142 M	37.1				D3280 Wolfsburg	•	
		MPG Is -1.45 % lo	wer than EPA	MPG ·	Dvno:			
						19 CERT DIESE	L (8 - 15 PPM S	ULFUR)
	I have valle	dated the data in a	ccordance with	the requirements				
		ay: 62473	<del>,</del>		Datos	5- Z.1-08		
	Validated 8	∃y: <u> </u>			Date.			
	Validated 8	By:			Date,			

·			_		Laboratory To			PAI	RTICULATE
		-			its- Refer to CFE	IS Reports for			
T	41	- 1		2008-0136-001				VW351 780169/0	)9
Test Infor	mation		Test Date:					VOLKSWAGEN	
URITED OF	A SEC.		-	09:59:06 / 09:52			MFR Code:		
	હો	Jan 1 and	Operator:				Config #:		
	<b>7</b> (E)	FUO! C	container ID:				Transmission:		
8 77K	<b>Z</b> \$\)				661 (8-12 ppm Su		Shift Schedule:	A09980005	
Contract of the second	action .				(w/o Can Load) (	ftp3bag)	Odometer:	004377.0 MI	
ORG PRO			ion Method:	Diesel			Drive Schedule:	ftp3bag	
			st Remarks:				Soak Period:	19.8 hours	
Quality Co		<u> </u>		ave been Identific	ed and noted				
Particulate			Filter	Tere	Gross	Net Wt	Total Mass	Total Mass	Filter
	Sampler		No.	(Pre Wt)	(Post Wt)	mg	mg	mg / ml	comment
Phase 1		Α	8004710	146.6294	146.6693	0.03954	15.096	4.214	
		₿	8004711	153,5917	153.6318	0.03972	15,039	4.198	
		С	8004712	148.0566	148,0937	0.03674	13.903	3.881	
	Remarks:	Filt	A Excluded fr	om Wahtd					
		1111	THE PERSON NAMED IN	**************************************			•	•	•
Phase 2		Α	8004713	150.3360	150.3400	0.00359	1,365	0.356	
		9	8004714	150.0153	150.0196	0.00389	1.466	0.382	
		С	8004715	149.1184	149.1231	0.00430	1,619	0.422	
	Remarks:	Filt	A Excluded fro	om Wahtd					
							•	•	•
Phase 3		Α	8004716	145.3921	145,3962	0.00371	1,403	0.392	
		В	8004717	149.4850	149.4834	0.00000	0.000	0.000	
		С	8004718	146.2069	146.2100	0.00270	1,025	0.286	
	Remarks:								
							,	•	•
Phase 4									
	Remarks:	This	taut bae nad	iculate results.					
	Montaine,	.1115	restrias part	Colste Teaults.			•	*	•
Average R	esults					Net Wt	Total Mass	Total Mass	
						mg	mg	mg / mi	
	Phas					0.03867	14.471	4.040	
	Phas	e 2				0.00393	1.542	0.402	
	Phas	e 3				0.00214	1,214	0,339	
	Welghted: de	rived fro	om filters in sa	mpler A:				1.16725	
	Weighted: de			•				1.06972	
	Weighted: de							1,10341	
	Weighted All							1.14048	
	Filter Stabili		k	Táre	Gross	Net Wt	Stability Check	Dyno #:	חפפפ
	g Net or 0.01		No.	(Pre Wt)	(Post Wt)	mg	PASS/FAIL	inertia:	
-,	_	.01	1	149,21840	149.21700	-0.00140	PASS	EPA Set Co A:	
	v	. 🗸 1	2	148.21290	146.21230				
•			-	170.21280	140.21200	-0.00060	PASS	EPA Set Co B:	
								EPA Set Co C:	
								DriveTire PSI:	
		Em080520						Emissions Bench	
/080204 - d3			G9271A		Page 1 of 2			Selvi Wime	21-May-2008 08:1

Final Laboratory Test Results- Refer to CFEIS Reports for Official Data  Test Number: 2008-0136-001  Vehicle ID: VW351 780169/09  VEIGHING CHAMBER  Date  Time  (id)  (°F)  (%)  Status @ timestamp  re-test 5/19/08  12:48:00  021616  71.4  44.3  NORM @ 05/19/08 10:37:28  cst-test 5/20/08		1		NVFE	L Laboratory Tes	st Data	PARTICULATE
Pictors   Chamber   Data   Time   Chartot   Chamber Terms   Humidity   Lest Chamber in Status   Status @ timestand   Pictors   5/19/08   12:48:00   021616   71.4   44.3   NORM @ 05/19/08 10:37:28   NORM @ 05/19/08 10:37:28	(2	2,)	Final Labora	tory Test Res	sulta- Refer to CFE	S Reports for	r Official Data
Date   Time   (10)   (17)	VEIGHING	ruanded	rest number: 2				
Park	AEIGUNA		Tim-				
Pase	Project						
Sest Conditions	-						NORM @ 05/19/08 10;37;28
Barometer (InHg)   28.67   28.67   28.65   28.65   Avg Cell Temp (degF)   71.70   71.76   71.87   71.76   71	<u>Opt-foot</u>	3/20/00	13:00:00	021676	71.3	45	NORM @ 05/19/08 10:37:28
Barometer (In-Ig) 28.67 28.67 28.66  Avg Cell Temp (degF) 71.70 71.76 71.67  Dew Point (degF) 47.54 46.90 48.20  Specific Humidity (grains/ibm) 50.95 49.72 48.41  Nox Corr Factor 0.8984 0.8938 0.8889  Dillution Factor 17.95 28.69 20.81  CFV Vmix (scf @68F) 2787.99 4773.81 2780.80  Sample Volume A (scf @68F) 7.822 12.789 7.414  Sample Volume B (scf @68F) 7.422 12.789 7.414  Sample Volume B (scf @68F) 7.425 12.771 7.392  Sample Volume Average (scf @68F) 7.422 12.789 7.414  Sample Volume Average (scf @68F) 7.425 12.771 7.392  Sample Volume Average (scf @68F) 7.425 12.771 7.392  Sample Volume Average (scf @68F) 3.582 3.833 3.583  Min/Max Limit Checks  PSU Probe A (degC) 81.5 61.5 61.5  PSU Probe B (degC) 34.3 34.3 34.4  PSU Probe B (degC) 34.3 34.3 34.4  PSU Probe B (degC) 39.5 39.1 39.1  PSU Dil Air A (degC) 39.5 39.1 39.1  PSU Dil Air B (degC) 32.4 37.8 37.9  PSU Dil Air A (degC) 43.1 42.0 43.5 P14.7/- P2.41.0/-  PSU Pilter B (degC) 44.9 47.0 45.5  PSU Pilter B (degC) 45.2 44.8 44.7  PSU Dil Flow 8 (pm) 25.0 24.9 25.1  PSU Dil Flow 8 (pm) 25.0 24.9 25.1  PSU Dil Flow 8 (pm) 25.0 24.9 25.1  PSU Dil Flow 6 (pm) 25.0 24.9 25.1  PSU Di Flow 6 (pm) 25.0 24.9 25.1  PSU Di Proportionality  PSU C Proportional	est Condi	<u>ilons</u>		Phase 1	Phase 2	Phase 3	Phase 4
Avg Cell Temp (degF) 71.70 71.76 71.67  Dew Point (degF) 47.54 46.50 45.20  Specific Humidity (grains/bm) 50.95 49.72 48.41  NOX Corr Factor 0.8984 0.8938 0.8389  Dilution Factor 17.95 28.69 20.61  CFV Vmix (scf @68F) 2787.69 4773.81 2780.80  Sample Volume 8 (scf @68F) 7.381 12.671 7.407  Sample Volume 8 (scf @68F) 7.422 12.789 7.414  Sample Volume C (scf @68F) 7.422 12.789 7.414  Sample Volume Average (scf @68F) 7.422 12.789 7.414  Sample Volume Average (scf @68F) 7.402 12.743 7.404  Total Vmix (scf @68F) 2809.90 4812.04 2803.01  Phase Time (sec) 505.40 89.90 506.50  Distance (miles) 3.582 3.833 3.583  Min/Max Limit Checks  PSU Probe A (degC) 81.5 61.5 51.5  PSU Probe B (degC) 34.3 34.3 34.4  PSU Dil Air A (degC) 39.5 39.1 39.1  PSU Dil Air A (degC) 39.5 39.1 39.1  PSU Dil Air A (degC) 32.4 37.8 37.9  PSU Dil Air A (degC) 43.1 42.0 43.5 P141.7/- P2 41.0/-  PSU Filter B (degC) 44.9 47.0 45.5  PSU Filter B (degC) 44.9 47.0 45.5  PSU Filter B (degC) 44.9 47.0 45.5  PSU Filter B (degC) 45.2 44.8 44.7  PSU Dil Flow B (mp) 25.0 24.9 25.0  PSU Dil Flow C (mm) 25.0 24.9 25.1  PSU Dil Flow C (mm) 25.0			Barometer (InHa)				1.110.50
Dow Point (degF)   47,54   46,90   46,20   Specific Humidity (grains/lbm)   50,95   49,72   45,41   NDX Corr Factor   0,8984   0,8938   0,8889   Dilution Factor   17,95   28,59   20,81   CFV Wink (set @88F)   2787,89   4773,81   2780,80   Sample Volume A (set @88F)   7,381   12,871   7,407   Sample Volume B (set @68F)   7,422   12,789   7,414   Sample Volume C (set @68F)   7,425   12,771   7,382   7,404   Sample Volume Average (set @68F)   7,425   12,771   7,382   7,404   Total Vmix (set @68F)   2809,90   4812,04   2803,01   Phase Time (sec)   506,40   869,90   506,90   Distance (miles)   3,582   3,833   3,583   Min/Max Limit Checks   PSU Probe A (degC)   61,5   6							
Specific Humidity (grains/hbm)   50.95   49.72   48.41		, ,	ew Point (depF)				
NOx Corr Fector   0,8984   0,8938   0,8889   20,81   CFV Vmix (scf @68F)   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4773.81   2780.80   2787.69   4774.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41   2789.77   47.41		Specific Humi	dity (grains/ibm)				
Dilution Factor							
CFV Vmix (scf @68F)   2787.69   4773.81   2780.80							
Sample Volume A (scf @68F)   7.351   12.671   7.407		CFV \					
Sample Volume B (scf @68F) 7.422 12.789 7.414 Sample Volume C (sef @68F) 7.425 12.771 7.392  Sample Volume Average (scf @68F) 7.402 12.743 7.404  Total Vmlx (scf @68F) 2809.90 4812.04 2803.01  Phase Time (sec) 508.40 869.90 506.90  Distance (miles) 3.582 3.893 3.583  PSU Probe A (degC) 61.5 61.5 51.5  PSU Probe B (degC) 34.3 34.3 34.4  PSU Drobe C (degC) 34.3 34.3 34.4  PSU Dil Air B (degC) 32.4 37.8 37.9  PSU Dil Air B (degC) 43.1 42.0 43.5  PSU Filter A (degC) 43.1 42.0 43.5  PSU Filter B (degC) 43.1 42.0 43.5  PSU Filter B (degC) 45.2 44.8 44.7  PSU Dil Flow A (lom) 25.1 25.1 25.0  PSU Dil Flow A (lom) 25.0 24.9 25.0  PSU Dil Flow C (pm) 25.0 24.9 25.0  PSU B Proportionality  PSU B Proportionality  PSU C Proportionality  PSU A Proportionality  PSU A Exceptions have been identified and noted QC Exceptions have been				• •			
Sample Volume C (scf @68F) 7.425 12.771 7.382  Sample Volume Average (acf @68F) 7.402 12.743 7.404  Total Vmix (scf @68F) 2809.90 4812.04 2803.01  Phase Time (sec) 505.40 369.90 506.90  Distance (miles) 3.582 3.833 3.583  Min/Max Limit Checks  PSU Probe A (degC) 61.5 61.5 51.5  PSU Probe B (degC) 34.3 34.3 34.4  PSU Dil Air A (degC) 39.5 39.1 39.1  PSU Dil Air B (degC) 32.4 37.8 37.9  PSU Dil Air C (degC) 43.1 42.0 43.5 P1 41.7/- P2 41.0/-  PSU Filter A (degC) 44.9 47.0 45.5  PSU Filter B (degC) 45.2 44.8 44.7  PSU Dil Flow A (pm) 25.1 25.0  PSU Dil Flow B (pm) 25.0 24.9 25.0  PSU Dil Flow B (pm) 25.0 24.9 25.1  PSU Dil Flow C (pm) 25.0 24.9 25.1  PSU DI Proportionality  PSU D Proportionality  PSU D Proportionality  PSU C Proportionality  PSU C Proportionality  PSU D PSU A Proportionality  PSU C Proportionality  PSU A Proportionality  PSU		Sample Volum	ne B (scf @68F)				
Sample Volume Average (acf @68F)   7.402   12.743   7.404     Total Vmix (acf @68F)   2809.90   4812.04   2803.01     Phase Time (sec)   508.40   369.90   506.90     Distance (mlies)   3.582   3.833   3.583       PSU Probe A (degC)   61.5   61.5   61.5     PSU Probe B (degC)   34.3   34.3   34.4     PSU Probe C (degC)   34.3   34.3   34.4     PSU DII Air A (degC)   39.5   39.1   39.1     PSU DII Air B (degC)   32.4   37.8   37.9     PSU DII Air C (degC)   40.8   40.1   39.9     PSU Filter A (degC)   43.1   42.0   43.5   P1.41.7/- P2.41.0/-     PSU Filter B (degC)   44.9   47.0   45.5     PSU DII Flow A (lpm)   25.1   25.1   25.0     PSU DII Flow B (lpm)   25.0   24.9   25.0     PSU DII Flow C (lpm)   25.0   24.9   25.0     PSU B Proportionality     PSU B Proportionality     PSU B Proportionality     PSU C Proportionality     PSU A Exception -   Filter Paix   28xLUJed   20.5   50     A Subject   A Subject   A Subject   A Subject     Data Quality Flags     Filter room emblent conditions were within QC     Data Quality Flags     Filter room emblent conditions were within QC     Data Quality Flags     Filter room emblent conditions were within QC     Data Quality Flags     Filter room emblent conditions were within QC     Data Quality Flags     Filter room emblent conditions were within QC     Data Quality Flags     Filter room emblent conditions were within QC     Data Quality Flags     Filter room emblent conditions were within QC     Data Quality Flags     Filter room emblent conditions were within QC     Data Quality Flags     Filter room emblent conditions were within QC     Data Quality Flags     PSU Data Quality Flags							
Total Vmix (scf @e8F) 2809.90		outinple tolati	10 0 (00) (00)	11720	12.771	7,362	,
Total Vmix (scf @e8F) 2809.90	Sam	iole Volume Ave	rana /act @68E\	7.402	12 7/2	7.404	
Phase Time (sec) 506.40 869.90 506.90 Distance (miles) 3.582 3.833 3.583  PSU Probe A (degC) 61.5 61.5 51.5 PSU Probe B (degC) 34.3 34.3 34.4 PSU Probe C (degC) 34.3 34.3 34.4 PSU Dil Air A (degC) 39.5 39.1 39.1 PSU Dil Air B (degC) 40.3 40.1 39.9 PSU Dil Air C (degC) 40.3 40.1 39.9 PSU Filter A (degC) 43.1 42.0 43.5 P1.41.7/- P2.41.0/- PSU Filter C (degC) 44.9 47.0 45.5 PSU Filter C (degC) 45.2 44.8 44.7 PSU Dil Flow A (lpm) 25.1 25.1 25.0 PSU Dil Flow A (lpm) 25.0 24.9 25.0 PSU Dil Flow C (lpm) 25.0 24.9 25.1 PSU A Proportionality PSU B Proportionality PSU B Proportionality PSU C Proportionality PSU C Proportionality PSU C Proportionality PSU C Exceptions have been identified and noted  QC Exceptions have been identified and noted  QC Exceptions - PSU A Exception - Filter P is excluded as 5 hours in permaks de		•			· ·		
Distance (miles)   3.582   3.833   3.583			, — ,				
PSU Probe A (degC) 61.5 61.5 61.5 PSU Probe B (degC) 34.3 34.3 34.4 PSU Probe C (degC) 34.3 34.3 34.4 PSU Dil Air A (degC) 39.5 39.1 39.1 PSU Dil Air B (degC) 32.4 37.8 37.9 PSU Dil Air B (degC) 40.8 40.1 39.9 PSU Filter A (degC) 43.1 42.0 43.5 P1 41.7/- P2 41.0/- PSU Filter B (degC) 44.9 47.0 45.5 PSU Filter C (degC) 45.2 44.8 44.7 PSU Dil Flow A (ipm) 25.1 25.1 25.0 PSU Dil Flow B (ipm) 25.0 24.9 25.0 PSU Dil Flow C (ipm) 25.0 24.9 25.1 PSU D PSU D Proportionality PSU B Proportionality PSU B Proportionality PSU C Proportionality PSU A Proportionality PSU B Proportionality PSU B Proportionality PSU B Proportionality PSU C Proportionality PSU C Proportionality PSU C Proportionality PSU C Proportionality PSU A Proportionality PSU B Proportionality PSU C Proportionality PSU C Proportionality PSU B Proportionality PSU C Proport							
PSU Probe A (degC) 61.5 61.5 61.5 PSU Probe B (degC) 34.3 34.3 34.4 PSU Probe C (degC) 34.3 34.3 34.4 PSU Probe C (degC) 39.5 39.1 39.1 PSU Dil Air A (degC) 39.5 39.1 39.1 PSU Dil Air B (degC) 32.4 37.8 37.9 PSU Dil Air C (degC) 40.6 40.1 39.9 PSU Filter A (degC) 43.1 42.0 43.5 P1.41.7/- P2.41.0/- PSU Filter B (degC) 44.9 47.0 45.5 PSU Filter C (degC) 45.2 44.8 44.7 PSU Dil Flow A (lpm) 25.1 25.1 25.0 PSU Dil Flow B (lpm) 25.0 24.9 25.0 PSU Dil Flow C (lpm) 25.0 24.9 25.1 PSU A Proportionality PSU B Proportionality PSU B Proportionality PSU C Proportionality PSU A Proportionality PSU B Proportionality PSU B Proportionality PSU B Proportionality PSU C Proportionality PSU A Proportionality PSU B Proportionality PSU C Proportionality PSU B P			-10cm (111104)	U. UUE,	0,000	3,083	Adda Mary 1 Sant Office Land
PSU Probe B (degC) 34.3 34.3 34.4  PSU Probe C (degC) 34.3 34.3 34.4  PSU DII Air A (degC) 39.5 39.1 39.1  PSU DII Air B (degC) 32.4 37.8 37.9  PSU DII Air C (degC) 40.8 40.1 39.9  PSU Filter A (degC) 43.1 42.0 43.5 P1 41.7/- P2 41.0/-  PSU Filter B (degC) 44.9 47.0 45.5  PSU Filter C (degC) 45.2 44.8 44.7  PSU DII Flow A (lpm) 25.1 25.1 25.0  PSU DII Flow B (lpm) 25.0 24.9 25.0  PSU DII Flow C (lpm) 25.0 24.9 25.1  PSU A Proportionality  PSU B Proportionality  PSU B Proportionality  PSU C Proportionality  PSU C Proportionality  PSU C Proportionality  PSU B PSU A Proportionality  PSU B PSU B PROPORTIONALITY  PSU		PSU	Probe A (denC)	816	£1 E	E4 E	win/wax Limit Unecks
PSU Probe C (degC) 34.3 34.3 34.4 PSU DII Air A (degC) 39.5 39.1 39.1 PSU DII Air B (degC) 32.4 37.8 37.9 PSU DII Air C (degC) 40.8 40.1 39.9 PSU Filter A (degC) 43.1 42.0 43.5 P1 41.7/- P2 41.0/- PSU Filter B (degC) 44.8 47.0 45.5 PSU Filter C (degC) 45.2 44.8 44.7 PSU DII Flow A (lpm) 25.1 25.1 25.0 PSU DII Flow B (lpm) 25.0 24.9 25.0 PSU DII Flow C (lpm) 25.0 24.9 25.1 PSU A Proportionality PSU B Proportionality PSU B Proportionality PSU C Proportionality							<b>'</b>
PSU DII Air A (degC) 39.5 39.1 39.1 PSU Dii Air B (degC) 32.4 37.8 37.9 PSU Dii Air C (degC) 40.8 40.1 39.9 PSU Filter A (degC) 43.1 42.0 43.5 P1 41.7/- P2 41.0/- PSU Filter B (degC) 44.9 47.0 45.3 PSU Filter C (degC) 45.2 44.8 44.7 PSU DII Flow A (lpm) 25.1 25.1 25.0 PSU DII Flow B (lpm) 25.0 24.9 25.0 PSU DII Flow C (lpm) 25.0 24.9 25.1 PSU A Proportionality PSU B Proportionality PSU B Proportionality PSU C Propo							
PSU Dil Air B (degC) 32.4 37.8 37.9 PSU Dil Air C (degC) 40.6 40.1 39.9 PSU Filter A (degC) 43.1 42.0 43.5 P1 41.7/- P2 41.0/- PSU Filter B (degC) 44.9 47.0 45.5 PSU Filter B (degC) 45.2 44.8 44.7 PSU Dil Flow A (lpm) 25.1 25.1 25.0 PSU Dil Flow B (lpm) 25.0 24.9 25.0 PSU Dil Flow C (lpm) 25.0 24.9 25.1 PSU B Proportionality PSU B Proportionality PSU B Proportionality PSU C Proportionality PSU							
PSU Dil Air C (degC) 40.8 40.1 39.9 PSU Filter A (degC) 43.1 42.0 43.5 P1 41.7/- P2 41.0/- PSU Filter B (degC) 44.9 47.0 45.5 PSU Filter C (degC) 45.2 44.8 44.7 PSU Dil Flow A (lpm) 25.1 25.1 25.0 PSU Dil Flow B (lpm) 25.0 24.9 25.0 PSU Dil Flow C (ipm) 25.0 24.9 25.1 PSU A Proportionality PSU B Proportionality PSU B Proportionality PSU C Proportiona							
PSU Filter A (degC) 43.1 42.0 43.5 P1 41.7/- P2 41.0/- PSU Filter B (degC) 44.9 47.0 45.5 PSU Filter C (degC) 45.2 44.8 44.7 PSU Dil Flow A (lpm) 25.1 25.1 25.0 PSU Dil Flow B (lpm) 25.0 24.9 25.0 PSU Dil Flow C (lpm) 25.0 24.9 25.1 PSU A Proportionality PSU B Proportionality PSU B Proportionality PSU C Pro							
PSU Filter B (degC) 44.9 47.0 45.5 PSU Filter C (degC) 45.2 44.8 44.7 PSU Dil Flow A (lpm) 25.1 25.1 25.0 PSU Dil Flow B (lpm) 25.0 24.9 25.0 PSU Dil Flow C (lpm) 25.0 24.9 25.1 PSU A Proportionality PSU B Proportionality PSU B Proportionality PSU C Proportionalit							D4 /4 D1 DA /4 A1
PSU Filter C (degC) 45.2 44.8 44.7  PSU DII Flow A (lpm) 25.1 25.1 25.0  PSU DII Flow B (lpm) 25.0 24.9 25.0  PSU DII Flow C (lpm) 25.0 24.9 25.1  PSU A Proportionality  PSU B Proportionality  PSU C Proportionality  PSU B Proport							P1 41.//- P2 41.U/-
PSU DII Flow A (Ipm) 25.1 25.1 25.0 PSU DII Flow B (Ipm) 25.0 24.9 25.0 PSU DII Flow C (Ipm) 25.0 24.9 25.1 PSU A Proportionality PSU B Proportionality PSU C Proportionality PS				•	• •		*
PSU DII Flow 8 (lpm) 25.0 24.9 25.0 PSU DII Flow C (lpm) 25.0 24.9 25.1 PSU A Proportionality PSU B Proportionality PSU C Proportionality  Onto Quality Flags Filter room emblent conditions were within QC limits; Filter net weights include buoyancy corrections.  QC Exceptions have been identified and noted QC Exceptions: PSU A Exception - Filter A is excluded as shown in remarks SB I have validated the data in accordance with the requirements of TP 730					•		
PSU DII Flow C (ipm) 25.0 24.9 25.1  PSU A Proportionality PSU B Proportionality PSU C Proportionality PSU C Proportionality PSU C Proportionality  Onto Quality Flags Filter room emblent conditions were within QC limits; Filter net weights include buoyancy corrections.  QC Exceptions have been identified and noted  QC Exception: -PSU A Exception - Filter A is excluded as shown in remarks SB  I have validated the data in accordance with the requirements of TP 730		BOIL	Dil Flow B (inm)				
PSU A Proportionality PSU B Proportionality PSU C Proportionality PSU C Proportionality  PSU C Proportionality  Data Quality Flags Filter room emblent conditions were within QC limits; Filter net weights include buoyancy corrections.  QC Exceptions have been identified and noted  QC EXCEPTION: -PSU A Exception - Filter A is excluded as shown in remarks BB  I have validated the data in accordance with the requirements of TP 730						***	
PSU B Proportionality PSU C Proportionality  PSU C Proportionality  Data Quality Flags Filter room emblent conditions were within QC limits; Filter net weights include buoyancy corrections.  QC Exceptions have been identified and noted  QC EXCEPTION: -PSU A Exception - Filter A is excluded as shown in remarks SB I have validated the data in accordance with the requirements of TP 730				25.0	24.9	25.7	
PSU C Proportionality  Date Quality Flags Fliter room emblant conditions were within QC limits; Fliter net weights include buoyancy corrections.  QC Exceptions have been identified and noted  QC EXCEPTION: -PSU A Exception - Filter A is excluded as shown in remarks BB I have validated the data in accordance with the requirements of TP 730							
Data Quality Flags Fliter room emblant conditions were within QC limits; Fliter net weights include buoyancy corrections.  QC Exceptions have been identified and noted QC EXCEPTION: -PSU A Exception - Filter A is excluded as shown in remarks 88 I have validated the data in accordance with the requirements of TP 730							
QC Exceptions have been identified and noted QC EXCEPTION: -PSU A Exception Filter A is excluded as shown in remarks DB I have validated the data in accordance with the requirements of TP 730			• • • • •				
QC Exceptions have been identified and noted QC EXCEPTION: -PSU A Exception - F. I for A is excluded as shown in remarks 88 I have validated the data in accordance with the requirements of TP 730	<u>Dat</u>	a Quality Flags I	Fliter room emblent	t conditions w	era within QC limits;	filter net welg	ghts include buoyancy corrections.
I have validated the data in accordance with the requirements of TP 730		(	QC Exceptions hav	e been identii	fied and noted 🔒		
		•	QC EXCEPTION:	-PSU A Exce	ption filter		planer as submit in lettures on 115
Validated By: 62423 Date: 5-2/-05	ι	have validated ti	he data in accordar	nce with the n	-		
	V	'alldated By:	62423	*** ***	***************************************	Date: _ 5-	-21-05
							Print Time 21-May-2008 08:17

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**NVFEL Laboratory Test Data** 

Final Laboratory Test Results- Refer to CFEIS Reports for Official Data Test Number: 2008-0136-002

Vehicle ID: VW351 780169/09 MFR Name VOLKSWAGEN

MFR Code: 590

Test Date: 5/20/2008 Test Information Key Start: 11:18:19 HITED STATE

Operator: 62423 Fuel Container ID: F0024C

0,340 / 0.219

Fuel Type: 19 2007 Cert Diesel (8-12 ppm Sulfur)

Test Procedure: 03 HWFET (hwfetprep\_hwfet) Calculation Method: Diesel

Config #: 00 Transmission: AUTO Shift Schedule: A09980011 Odometer: 004388.0 MI

Drive Schedule: hwfet\_hwfet

	Pretest Remarks:						
Quality Control:	QC Exceptions ha	ve been ide <u>ntif</u> l	ed and noted				
Bag Data	THC / IntTHC	<u>co</u>	NQx	<u>CO2</u>	CH4	NonMeth HC	
Phase 1	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	2,455 / 2,335	0.431	0.163	0.624	2.172		
Ambient	2,219	0.057	0.004	0.042	1.913		
Net Concentration	0.340 / 0.219	0,377	0.159	0.585	0.348	-0.191	Warning

Remarks:

Phase 2

Sample Amblent Net Concentration

Net Concentration

Remarks:

Phase 3

Sample Amblent

Net Concentration

Remarks:

Phase 4

Sample Ambient Net Concentration

Remarks: This test has particulate results.

		44.4					
Results	THC/I	ntTHC CO	NOX	CO2	CH4	NMHC	Vol MPG
	(gp		(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Pha		0.007	0.005	181.2	0.004	0.000	<b>55.87</b> 6

<NMOG=NMH\$

Fuel Economy	Diesel MPG		19.22	<u>Dyno Settings</u>	Dyno #:	D329
2	Phase 1 56.16		19.26		Inertia:	3750
	- 1122		19.26		EPA Set Co A:	18.38
			19.26		EPA Set Co B:	-0.1203
			19.28		EPA Set Co C:	0.02109
		•		Front / Rear.	/ DriveTire PSI:	35 / 35 / 35
			19.25	En	rissions Bench:	D329
v080204 - d329	EPAVDAEm080520104909	Page 1 of 2			Print Tim	e 21-May-2008 09:17

	one and the short of the short		NVFEL	Laboratory Te	st Data			CVS
		Final Laborat	ory Test Resul	ts- Refer to CFE	IS Reports for Of	ficial Data	AAINEA TOAKOAIA	,
		Test Number: 20			000		VW351 780169/0 NMHC	e Meth Response
Results  THE PROTECTION OF THE	Phase 1 Phase 2 Phase 3 Phase 4	THC / IntTHC (grams) - / 0.022	<u>CO</u> (grams) 0.076	<u>NOx</u> (grams) (grams) 0.047	<u>CO2</u> (grams) 1854.6	<u>CH4</u> (grams) 0.040 .	(grams) 0.000	1.179
cvs	Avg Ce De- eclfic Humic N CO2 CFV V Total N CVS Flow F I-SFV Exh I	aromater (InHg) all Temp (degF) aw Point (degF) lity (grains/lbm) IOX Corr Factor Dilution Factor mix (scf @68F) /mix (scf@68F) Rate Avg (scfm) Flow Avg (scfm) Fan Placement: Case Time (secs) Distance (miles) sis Time (secs)	765.10 10.237		Phase 3	Phase 4	21-06	
MFR Te		for Procedure 3 H				;		
<u>M</u> F	R Number 1084706	<u>HÇ</u> 0.0088	<u>co</u> 0	<u>NOx</u> 0.005	<u>CO2</u> 184	NMQG 0	NonMeth HC 0.0004	
	Odometer 4153 M	MPG 55.3 MPG is -1.53 % I	ower than EPA	MPG	Dyno:			JLFUR)
		dated the data in a		the requirement			•	•
	Validated	By: 6242	3		Date:	5-21-08	and and another the second and a	
v080204 - g328 EF	PAVDAEm080	520104909		Page 2 of 2			Print Tin	ne 21-May-2008 09:1

τ.			aboratory Te			PAR	RTICULATE
		ratory Test Result 2008-0136-002	ta- Refar to CFE	is Reports for		VW351 780169/0	9
	Test Date: Key Start: Operator: Fuel Container ID; Fuel Type; Test Procedure: Calculation Method; Pretest Remarks;	5/20/2008 11:18:19 62423 F0024C 19 2007 Cert Dies 03 HWFET (hwfel	tprep_hwfet)	ifur)	MFR Name MFR Code: Config #: Transmission: Shift Schedule:	VOLKSWAGEN 590 00 AUTO A09980011 004388.0 MI	
Quality Control: Perticulate Filter	QC Exceptions t	nave been identifie Tare	d and noted Gross	Net Wt	Total Mass	Total Mass	Filter
Sampler Phase 1	No. A 8004707 B 8004708 C 8004709	(Pre Wt) 144,9075 146,8781	(Post Wt) 144.9112 146.8831 148.4243	mg 0.00305 0.00435 0.00264	mg 1.685 2.371 1.447	mg / mi · 0.165 0.232 0.141	comment
. Remarks:					•	i	•
Remarks: Phase 3							
Remarks: Phase 4						·	
Remarks:	This test has pa	rticulate results.					
Average Results Phas	e 1			<u>Net Wt</u> mg 0.00335	<u>Total Mass</u> mg 1.834	Total Mass mg / ml 0,179	
						•	ı
Reference Filter Stabil 2% of Avg Net or 0.01		<u>Tere</u> (Pre Wt) 149.21590 146.21010	<u>Gross</u> (Post Wt) 149.21750 146.21370	Net Wt mg 0.00160 0.00360	Stability Check PASS/FAIL PASS PASS	Dyno #: Inertia: EPA Set Co A: EPA Set Co B: EPA Set Co C: DriveTire PSI: Emissions Benci	3750 18.38 -0.1203 0.02109 35 / 35 / 35
V080204 - d328 EPAVDA	Em080520104909		Page 1 of 2			Print Tim	a 21-May-2008 09:1

	**************************************			L Laboratory Tes			PARTICULAT
(ZZ	2 0	Final Laborat Test Number: 20		iults-Refer to CFEI	Reports for	Official Data Vehicle ID: VW351 7801	69/09
IGHING	CHAMBER		Operator	Chamber Temp	Humidity	Last Change in Status	00/00
********	Date	Time	(ld)	(°F)	(%)	Status @ timestamp	
e-test	5/19/08	11:54:00	021616	71.2	43.6	NORM @ 05/19/08 10:37:28	
st-test	5/20/08	13:53:00	021616	71.5	44.9	NORM @ 05/19/08 10:37:28	
<u> </u>	0/20/00	10.00.00	02.1070	, 1.0		14011111 @ 00/10/00 10:0/120	*
st Conditi	lons		Phase 1	Phase 2	Phase 3	Phase 4	
	I	Barometer (InHg)	28.66				
	Avg (	Cell Temp (degF)	71.47				
	_	Daw Point (degF)	46.63				
		ildity (grains/lbm)	49.03				
		NOx Corr Factor	0.8912				
		Dilution Factor	21.45				
	ĈEV	Vmix (scf @68F)	6088.57			,	
		me A (scf @66F)	11,095				
		me B (scf @68F)	11.222				
	P	ma C (scf @68F)	11.158				
	Ogmpia Voidi	me o (so (goor)	11.130				
Sam	ple Volume Ave	erage (scf @68F)	11.158				
	Total	Vmlx (scf @68F)	8122.04				
	F	Phase Time (sec)	765.10				
		Distance (miles)	10.237				
						Min/Max Lin	nit Checks
	PSL	J Probe A (degC)	61.6	1			
	PSL	J Probe B (degC)	34.9				
	PSL	J Probe C (degC)	34.9				
	PSU	J Dll Air A (degC)	39,5				
		J Dil Air B (degC)	36.7				
		J Dli Air C (degC)	40.3				
•		U Filter A (degC)	44.4				
		U Filter B (danC)	49.9		1	•	
	•	U Filter C (degC)	44.1				
		J Dii Flow A (lpm)	25.0				
		J Dil Flow 3 (Ipm)	24.9				
		J Dil Flow C (Ipm)	24.9				
		,, ,	44.3				
		A Proportionality					
		B Proportionality					
	PSU	C Proportionality					
<u>Dat</u>	ta Quality Flags			vere within QC limits;	Filter net well	ghts include buoyancy correction	<b>1</b> 8,
		QC Exceptions have	ve 1680 (08 <b>1</b> )	med and noted 5	15 Chec	ks OK XIP 5-21-08	
1	have validated	the data in accorda	nce with the r	equirements of TP 7	30		
1.	/alldated By:	62423			Date: 5	21-08	
·	randated by.	0 - 100		-	Dalo	- 1 - 0	
80204 - d329	B EPAVDAEmO	80520104909		Page 2 of 2		Prin	1 Time 21-May-2008

Test Information

CVS

**NVFEL Laboratory Test Data** Final Laboratory Test Results- Refer to CFEIS Reports for Official Data

Test Number: 2008-0136-003 Test Date: 5/20/2008

Vehicle ID: VW351 780169/09

Key Start: 12:30:49

Operator: 62423

MFR Name VOLKSWAGEN MFR Code: 590 Config #: 00

Fuel Container ID: F0024C Fuel Type: 19 2007 Cert Diesel (8-12 ppm Sulfur)

Transmission: AUTO Shift Schedule: A09980041 Odometer: 004413,0 MI

Test Procedure: 90 US06 (us06warmup\_us06) Calculation Method: Diesel

Drive Schedule: us06\_us06

Pretest Remarks:

Quality Control:	This data meets al	automated qu	ality control chec	ks. No problems	were identified.	· · · · · · · · · · · · · · · · · · ·	
Bag Data	THC / IntTHC	ÇQ	NOx	CO2	CH4	NonMeth HC	P
Phase 1	(ppmC)	(ppm)	(ppm)	(%)	· (ppm)	(ppmC)	
Sample	10,979 / 11,730	0.848	3,663	0.871	9.688	(FF)	
Ambient	2.256	0.111	0.039	0.042	1.908		
Net Concentration	8.870 / 9.621	0.745	3,627	0.832	7.884	ก 325	

Remarks:

Phase 2

Sample **Ambient** Net Concentration

Remarks:

Phase 3

Sample Amblent Net Concentration

Remarks:

EPAVDAEm080520120392

Phase 4

Sample Ambient

Net Concentration

Remarks: This test has particulate results.

Results	THC / IntTHC	ÇQ	<u>NOx</u>	CO2	CH4	NMHC	Vol MPG
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mqg)	(mpg)
Phase	e 1 - / 0,111	0.017	0.125	303.5	0.105	0.004	33.322

<NMOG=NMHC>

Fuel Economy Diesel MPG Dyno Settings Dyno #: D329 Phase 1 33.49 Inertia: 3750

Page 1 of 2

EPA Set Co A: 16.38 EPA Set Co B: -0.1203 EPA Set Co C: 0.02109

Front / Rear / DriveTire PSI: 35 / 35 / 35

Emissions Bench: D329

Print Time 20-Mey-2008 15:15

5/20/2008 3:15 PM

v080204 - d329

20020136035

VTAURdxxx.xls

			NVFEL	Laboratory To	est Data			CVS	
	Final Laboratory Test Results- Refer to CFEIS Reports for Official Data  Test Number: 2008-0136-003 Vehicle ID: VW351 780169/0								
esults	<u> </u>	THC / IntTHC	CO	NOx	ÇOZ	CH4	The second liverage with the second liverage w		
TO STATE OF TAKEN	Phase 1 Phase 2 Phase 3 Phase 4	(grams) - / 0,885	(grams) 0.138	(grams) 0.996	(grams) 2427.2	(grams) 0.639	NMHC (grams) 0.030	Meth Respons 1.179	
est Conditions			Phase 1	Phase 2	Phase 3	Phase 4		,	
		arometer (InHg)	28.65						
	Avg Co	II Temp (degF)	71.13		•				
	De	aw Point (degF)	47,84						
Sp	ecific Humid	ilty (grains/lbm)	51.55						
	l N	IOx Corr Factor	0.9007						
	CO2	Dilution Factor	15.360						
	CFV V	mix (scf @68F)	5607.58						
	Total \	/mlx (scf@68F)	5633.84						
		Rate Avg (scfm) Flow Avg (scfm)	558.90				•		
		Fan Placement: U	SO8 Only - On	e Large Fan - Doy	vn - Frant				
	Pha	se Time (secs)	602.00						
•		Distance (miles)	7.989						
		sis Time (secs)	87.5						
<u>Data Qu</u>	elity Flage					1			
		his data meets all	antowated do	ality control check	is. No problems w	vere identified.			
MFR Te	st Results	for Procedure 90 (	JS08						
MF	R Number	HC	co	NOx	<u>CO2</u>	NMOG	NonMeth HC		
	1084707	. 0	<u>co</u> 0	NOx 0	0	0	0		
	Odometer	MPG			MFR Lab:	Volkswagen AG	i, Dept. E/TZ-TZ		
	4174 M	0				D3280 Wolfsbu	rg 1,Germany		
					Dyno:	-	EL (8 - 15 PPM S	11121121	
	l have valid	ated the data in a	cordance with	the requirements		IN DERI DIEDI	=	ou on	
	Validated B	y. 62423			, Date;	5-21-08			

5/20/2008 3:15 PM

-				NVFEL	Laboratory Te	st Data	1	PA	RTICULATE
		Tes	Fi <b>nal Lab</b> oi It Number	ratory Test Res 2008-0136-003	ults- Refer to CFE	IS Reports for		104054 700405	(0.0
est Inform	nation		Test Date:			ACCES AND ACCESS OF THE ACCESS	MER Name	VW351 780169	709
USITED STA	RES.		Key Start:	12:30:49			MFR Code:		
<b>5</b>	<i>**</i> ?		Operator:				Conflg #:		
	7 🖺		ntainer ID:				Transmission:		
	스 왕		Fuel Type:	19 2007 Cert Di	esel (8-12 ppm Su	lfur)	Shift Schedule:		
To the same of the	at 187	Test F	Procedure:	90 US08 (us08)	varmup_us06)	•	Odometer:	004413.0 MI	
PROT		Calculatio	n Method:	Diesel			Drive Schedule:		
		Pretest	Remarks:						
luality Cor enticulate	ntroi: <u>Filter</u>	inis	Eliter		ality control check				
M. C.	Sampler		No.	Tere (Pre Wt)	<u>Gross</u> (Post Wt)	Net Wt	Total Mass	Total Mass	Filter
hase 1	221	Α	8007423	145.3743	145,3777	mg 0.00281	mg	mg/ml	comment
mana .		В	8007424	142,8005	142.8019	0.00281	1.810 0.525	0.226	
		c	8007425	149,5182	149.5211	0.00229		0.066	
		•	0007720	175,5102	(48.021)	0.00225	1.471	0.184	
I	Remarks:								
				•			·	•	•
hase 2						•			•
,	Remarks:						•		•
hase 3									
110000									
	Remarks:								
,	Williams.						•	•	•
hass 4						-			
								•	
Ī	Remarks:	This t	est has par	ticulate results.	•		•	•	•
verage Re	esults					Net Wt	Total Mass	Total Mass	
						mg	mg	mg/ml	
	Phase	<b>9</b> 1				0.00197	1.269	0.159	
							•		
					,				
leferençe l	Filter Stabilit	V Check		Tare	Gross	Net Wt	Stability Check	Dyno #:	D329
2% of Avg	Net or 0.01	mg	No.	(Pre Wt)	(Post Wt)	mg	PASS/FAIL	Inertia:	3750
	O.	.01	1	149.22050	149.21810	-0.00240	PASS	EPA Set Co A:	
			2	146,21540	146.21270	-0.00270	PASS	EPA Set Co B:	
								EPA Set Co C:	
								DriveTire PSI:	
								Emissions Benc	D329
		m0605201			/Page 1 of 2				

6 O	(2) E		NVFE	Laboratory Tes	t Data	P	ARTICULATE
12	Z, <b>)</b> )	Final Laboratory Test Results- Refer to CFEIS Reports for Official Date					
WEIGH WAS	<i>5</i> /	Test Number: 2	*****	THE PARTY NAMED IN COLUMN TWO IS NOT THE PARTY NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED		Vehicle ID: VW351 780169	/09
YEIGHING	CHAMBER	<b></b>	Operator	Chamber Temp	Humidity	Last Change in Status	
4	Date	Time	(id)	(°F)	(%)	Status @ timestamp	
re-test	5/19/08	11:32:00	021616	71.7	43.6	NORM @ 05/19/08 10:37:28	
ost-test	5/20/08	14:12:00	021616	71.8	44.1	NORM @ 05/19/08 10:37:28	
est Condit	lons		Phase 1	Phase 2	Phase 3	Phase 4	
		Berometer (InHa)	28.65	<u> </u>	1 H230 3	<u> </u>	
		cell Temp (degF)	71.13				
		Daw Point (degF)	47.84				
		ldity (grains/lbm)	51.55				
		NOx Corr Factor	0.8007				
		Dilution Factor	15.36				
	CFV \	Vmix (scf @68F)	5607.58				
	Sample Volum	ne A (scf @58F)	8,738				
		ne B (scf @68F)	8.753				
		na C (scf @58F)	8.769				
Sam	pie Volume Ave	rage (ecf @68F)	8.753				
	/ letoT	/mlx (scf @68F)	5633.84	1			
	₽	hase Time (sec)	602.00				
		Distance (miles)	7.999				
						Mln/Max Limit (	Checks
		Probe A (degC)	81.5				
		Probe B (degC)	35.3				
		Probe C (degC)	35.8				
		Dli Air A (degC)	39.1				
		Dil Air B (degC)	36,1				
		Dil Air C (degC)	39.5				
	PSL	J Filter A (degC)	45.3				
		J Filter B (degC)	45,3			•	
		J Filter C (degC)	45,1				
		Oll Flow A (Ipm)	24.7				
	PSU	DII Flow B (Ipm)	24.7				
		Dil Flow C (Ipm)	24.7				
		A Proportionality					
	PSU E	3 Proportionality					
	PSU (	C Proportionality	•				
Dati	a Quality Flags	Filter room ambient	conditions we	ere within QC limite; I	Filter net weig	hts include buoyancy corrections.	
	•	This data meets all	automated qu	ality control checks.	No problems	were identified.	
ŧ	nave valldated t	he data in accordar	ice with the re	quirements of TP 73	0		
V	alldated By:	62423	<u></u>	[	Date:	-2/-08	
				•			

С 9VWX09009738 VWX VW351 780169/09 2 20080520 90 19 4413 Μ Ν Ν D329 THIS TEST HAS PARTICULATE RESULTS. [NMOG=NMHC] TSD-LCS TEST#: (8) 13-6003, EPA FE Calc Rel8 HC-NM+NOX 0.1283183 NOX 0.1245747 CO2

303.456902			
HC-NM			
0.0037436			
PM			
0.0001587			
MFR FE			
33.5			
NMOG			
0.0037436			
FE BAG 1			
33.49			
METHANE			
0.1048967			
LIC TOTAL			
HC-TOTAL 0.1106565			
СО			

0.0172903

20101004 US06 D US06 33.5411 33.5 HC-NM+NOX 0.1283183 NOX 0.1245747 CO2 303.456902 HC-NM 0.0037436 PM 0.0001587 MFR FE

33.5

NMOG

0.0037436

FE BAG 1

33.49

**METHANE** 

0.1048967

**HC-TOTAL** 

0.1106565

CO

0.0172903

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com] From: "Giles, Michael (EEO)"
<b>Sent:</b> Fri 6/22/2012 7:39:11 PM
Subject: VW Group - Audi Q5 2.0L TFSI Decision Information
Hello Jim,
Today we submitted a decision information dataset for a new exhaust EDV as a carryover test group for the Audi Q5 2.0L TFSI.
the Addi Q3 2.0E 1131.
Note, at this is a non- FFV version of the Q5 (same as MY 2012). The FFV version will be classified under a separate test group as discussed in the cert-preview letter. At the time of the preview letter, this non
FFV version was not planned, but was later required until the FFV is ready.
Please let us know if you have any questions.
On a second topic, to follow up on the Jetta Hybrid confirmatory test: I had a problem submitting the
supplemental information, and I have an open ticket to the help desk to resolve. So, a minor delay in this step for now.
Thanks,
Mike
WINC
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road

1

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William (EEO)"
Sent: Mon 6/25/2012 11:10:25 AM

Subject: RE: VW certificate

snyder.jim@epa.gov

Jim,

The Verify system didn't require a new Certificate to process the FE litmus after the test number was changed to the factory 2-bag test. I'm not sure if a new Certificate request is needed. Any idea?

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, June 21, 2012 5:49 PM

To: Joel Dalton

Cc: Rodgers, William (EEO) Subject: VW certificate

Joel, VW is re-submitting a certificate after having to change a test number so Verify can do the Litmus test. It hasn't shown up yet so go ahead and approve if it appears friday while i'm out. You can talk to Bill if any questions about it., if it appears.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com] From: "Giles, Michael (EEO)" Mon 6/25/2012 7:19:57 PM Sent: Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid [mailto:Snyder.Jim@epamail.epa.gov] snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com mailto:Snyder.Jim@epamail.epa.gov snyder.jim@epa.gov michael.giles@vw.com mailto:Snyder.Jim@epamail.epa.gov snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com Hi Jim, Just to follow up, I finally managed to get the supplemental information accepted today for the Jetta Hybrid confirmatory test. Please advise of the test date at your earliest convenience. Thanks, Mike

From: Giles, Michael (EEO)

Sent: Wednesday, June 20, 2012 9:33 AM

To: 'Jim Snyder' Cc: Rodgers, William

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

The decision information for the Jetta Hybrid has been corrected to include the evaporative tests, as well as 3 additional supporting FTP tests.

Sorry about the omission, I was under the idea that the d.i. was relevant only for exhaust tests.
Regards,
Mike
From: Giles, Michael (EEO) Sent: Wednesday, June 20, 2012 8:56 AM To: 'Jim Snyder' Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid
Jim,
I will input the evaporative tests soon, sorry about the omission.
Regards
Mike
From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov] Sent: Wednesday, June 20, 2012 8:24 AM To: Giles, Michael (EEO) Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid
On page 2 and page 6 it mentions a 1.4L TFSI plug-in hybrid Jetta. It doesn't specify the test group # on those pages but I see no other on the chart.

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Jim Snyder
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Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/20/2012 08:14 AM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

I just checked our copy of the MY 2013 pre-certification document, and did not see any mention of plug in (looking at the table of page 10). The vehicle is clearly described a standard HEV in our data set we received.

If you do have a plug in described, can you tell me where so we can resolve or correct if necessary?

Thanks Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:46 PM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Are you positive? The cert preview document lists this vehicle and test group as a 1.4L TFSI with plug-in hybrid technology. Did they change it since October?

Jim Snyder Light-Duty Vehicle Group Compliance Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 06/19/2012 04:38 PM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

No plug in, I believe it is a standard "HEV" because there is no outside power source other than the fuel.

The available date is September 17th.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:33 PM

To: Giles, Michael (EEO)

Cc: Rodgers, William (EEO)

Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

Is this a plug-in hybrid? When will it be available for testing?

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/19/2012 03:45 PM

Subject: VW Group - Decision Info 1.4L Jetta Hybrid

Hello Jim,

I just submitted a decision request for the new 1.4L Jetta Hybrid (1.4L), for test group DVXXV01.4PHE.

This vehicle has new technology all around (engine, evaporative family, OBD system, ORVR system). Our understanding is that EPA will most likely want to do confirmatory tests.

Please let me know if you have any questions processing this request.

Thanks, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Cc: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com] "Giles, Michael (EEO)" Wed 6/27/2012 1:45:01 PM Beetle Test on Hold
Hi Jim,	
	ussed, we will need to reschedule the Beetle test originally set for July 11th. Please cancel this e will submit a new ready date in the next day or two, to re-schedule.
Thanks,	
Mike	
Michael Gi	les
Certificatio	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	ls, MI 48326
United Sta	tes of America
Phone +1-2	248-754-4229
FAX +1-248	3-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]  Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Thomas, Richard (EEO)"  [Richard.Thomas@vw.com]  From: "Giles, Michael (EEO)"  Sent: Sat 6/30/2012 5:49:11 PM  Subject: VW Group
Hi Jim,
Today we submitted the application and certificate request for Audi test group DADXT02.04UB.
This is a carryover test group only for the Q5 with 2.0L non- FFV version. When the production change is made to the FFV version, the FFV vehicles will fall in another FFV test group. Note also that we have new EDV exhaust tests for this vehicle.
Let me know if you need anything else to proceed with the certification.
Regards,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com] From: "Giles, Michael (EEO)" Mon 7/2/2012 6:13:32 PM Sent: Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid [mailto:Snyder.Jim@epamail.epa.gov] snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com mailto:Snyder.Jim@epamail.epa.gov snyder.jim@epa.gov michael.giles@vw.com mailto:Snyder.Jim@epamail.epa.gov snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com Hi Jim, Hope you had a good weekend. This is just a follow up on the hybrid test date we need. Please let me know the status when you can. Thanks, Mike

From: Giles, Michael (EEO)

Sent: Monday, June 25, 2012 3:20 PM

To: 'Jim Snyder' Cc: Rodgers, William

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

Just to follow up, I finally managed to get the supplemental information accepted today for the Jetta Hybrid confirmatory test.

Please advise of the test date at your earliest convenience.
Thanks,
Mike
From: Giles, Michael (EEO) Sent: Wednesday, June 20, 2012 9:33 AM
To: 'Jim Snyder' Cc: Rodgers, William
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid
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The decision information for the Jetta Hybrid has been corrected to include the evaporative tests, as well as 3 additional supporting FTP tests.
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Regards

2

## Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 20, 2012 8:24 AM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

On page 2 and page 6 it mentions a 1.4L TFSI plug-in hybrid Jetta. It doesn't specify the test group # on those pages but I see no other on the chart.

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snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/20/2012 08:14 AM

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From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:46 PM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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Jim Snyder Light-Duty Vehicle Group Compliance Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 06/19/2012 04:38 PM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

No plug in, I believe it is a standard "HEV" because there is no outside power source other than the fuel.

The available date is September 17th.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:33 PM

To: Giles, Michael (EEO) Cc: Rodgers, William (EEO)

Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

Is this a plug-in hybrid? When will it be available for testing?

Jim Snyder Light-Duty Vehicle Group Compliance Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/19/2012 03:45 PM

Subject: VW Group - Decision Info 1.4L Jetta Hybrid

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Thanks, Mike

Michael Giles
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United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: From:	Jim Snyder/AA/USEPA/US@EPA[] "Giles, Michael (EEO)"
Sent:	Mon 7/2/2012 7:30:55 PM
Subject:	RE: VW Group - Decision Info 1.4L Jetta Hybrid
	n@epa.gov
	illes@vw.com
	odgers@vw.com
	nyder.Jim@epamail.epa.gov] n@epa.gov
	illes@vw.com
	odgers@vw.com
	yder.Jim@epamail.epa.gov
	n@epa.gov
	illes@vw.com
mailto:Sn	yder.Jim@epamail.epa.gov
	n@epa.gov
	iles@vw.com
<u>William.R</u>	odgers@vw.com
<b>-</b> :	
	n, I appreciated it. Now that you mention it, I was thinking of Ex. 6
too but	it might have to wait a bit.
lust as a b	ands up ( I think I mantioned to you an the phone proviously), we have received and are now
	eads up (I think I mentioned to you on the phone previously), we have received and are now g quite a few RC/FF documents. You may already see the first ones we started with the last
	ys in the system.
couple day	's in the system.
Mike	
WIIKC	
From: lim	Snyder [mailto:Snyder.Jim@epamail.epa.gov]
	day, July 02, 2012 3:22 PM
	Michael (EEO)
	E: VW Group - Decision Info 1.4L Jetta Hybrid
Subject. Iti	2. VVV Group Decision into 1.42 Jetta Hybrid
Mike. I ha	ven't heard anything on the scheduling. There are a lot of people ( Ex. 6
	I don't think Ben was in today but I can look into it tomorrow,
Week	2 2 it was in county was i can look into it comorrowy
Jim Snyder	•
-	Vehicle Group
Complianc	
· ·	tes Environmental Protection Agency
5ca 5ta	The Later Control of Good Control of Control

(734) 214-4946 snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 07/02/2012 02:13 PM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

Hope you had a good weekend.

This is just a follow up on the hybrid test date we need. Please let me know the status when you can.

Thanks, Mike

From: Giles, Michael (EEO)

Sent: Monday, June 25, 2012 3:20 PM

To: 'Jim Snyder' Cc: Rodgers, William

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

Just to follow up, I finally managed to get the supplemental information accepted today for the Jetta Hybrid confirmatory test.

Please advise of the test date at your earliest convenience.

Thanks, Mike

From: Giles, Michael (EEO)

Sent: Wednesday, June 20, 2012 9:33 AM

To: 'Jim Snyder' Cc: Rodgers, William

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

The decision information for the Jetta Hybrid has been corrected to include the evaporative tests, as well as 3 additional supporting FTP tests.

Sorry about the omission, I was under the idea that the d.i. was relevant only for exhaust tests.

Regards, Mike

From: Giles, Michael (EEO)

Sent: Wednesday, June 20, 2012 8:56 AM

To: 'Jim Snyder'

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Jim,

I will input the evaporative tests soon, sorry about the omission.

Regards Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 20, 2012 8:24 AM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

On page 2 and page 6 it mentions a 1.4L TFSI plug-in hybrid Jetta. It doesn't specify the test group # on those pages but I see no other on the chart.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/20/2012 08:14 AM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

I just checked our copy of the MY 2013 pre-certification document, and did not see any mention of plug in (looking at the table of page 10). The vehicle is clearly described a standard HEV in our data set we received.

If you do have a plug in described, can you tell me where so we can resolve or correct if necessary?

Thanks Mike From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:46 PM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Are you positive? The cert preview document lists this vehicle and test group as a 1.4L TFSI with plug-in hybrid technology . Did they change it since October?

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 06/19/2012 04:38 PM

Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

No plug in, I believe it is a standard "HEV" because there is no outside power source other than the fuel.

The available date is September 17th.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 19, 2012 4:33 PM

To: Giles, Michael (EEO) Cc: Rodgers, William (EEO)

Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

Is this a plug-in hybrid? When will it be available for testing?

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/19/2012 03:45 PM

Subject: VW Group - Decision Info 1.4L Jetta Hybrid

Hello Jim,

I just submitted a decision request for the new 1.4L Jetta Hybrid (1.4L), for test group DVXXV01.4PHE.

This vehicle has new technology all around (engine, evaporative family, OBD system, ORVR system). Our understanding is that EPA will most likely want to do confirmatory tests.

Please let me know if you have any questions processing this request.

Thanks, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

**To:** richard.thomas@vw.com[]

Cc: oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[];

N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Tue 7/3/2012 4:10:33 PM

**Subject:** re: 2013 FE Guide Errors in Verify; Many errors when calculating adjusted combined fuel consumption(gal/100 miles); Request to update any 2013 Labels submitted before May 11, 2012

VW Group 2013 FEGuide1-all rel dates-no-sales-06-29-2012 PLUS new Rel10 fields.xlsx

## Richard,

As we discussed over the phone yesterday---you were one of the few manufacturers who calculated fuel consumption correctly---good Job!

#### Dave

1. Errors in Verify: Attached is a spreadsheet with the 2013 FE Label errors in Verify as of June 29, 2012. The spreadsheet contains all the 2013 FE Label data in Verify as of June 29, 2012 including some of the new Release 10 fields (columns 141-184). Color coding is explained in the heading for each column, except for the various shades of green. Labels with errors are highlighted in green fill in the first few columns or almost all columns---with the field where the error occurred highlighted in yellow fill. [Normal Green (not pea green) means the error occurred in the Combined Adjusted Fuel Consumption (gal/100 miles) field.]

When you get a chance, please correct the errors--so I can forward the corrected data to DOE for posting on the web on the 1st and 15th of each month.

2. Errors in Combined Adjusted Fuel Consumption: I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption" (column 165 of the attached spreadsheet). EPA calculated fuel consumption is in column 166. Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some manufacturers are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as prominently displayed on 2013 labels (window stickers)---as explained in more detail in Item 3, below.

When you get a chance, please correct the fuel consumption errors in Verify. [Note that I'm not currently sending fuel consumption values to DOE for posting on the web, so I don't need the fuel consumption errors corrected immediately. Please correct them as soon as possible, but if you need 2-3 weeks to correct them, that's OK with me.]

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

3. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

4. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at www.fueleconomy.gov to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values, adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. For this reason, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).

If possible, please try to update those labels before August 6, 2012. Please call or email me if you need more time to update your labels.

**Thanks** 

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"
Sent: Thur 7/5/2012 11:38:10 AM

Subject: FW: VW Group - Supplemental Information (HLP-2708)

Hello Jim,

Just a follow up on the test date for the Jetta Hybrid.

I worked with the VERIFY help desk to be sure that the supplemental information is in the system. Please let me know when we get a test date.

Thanks, Mike

----Original Message-----

From: Ex. 6 @csc.com] On Behalf Of Verify Help Desk

Sent: Tuesday, July 03, 2012 4:31 PM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Supplemental Information (HLP-2708)

Hello Mr. Giles,

I've verified that your Correction is in the system. Please verify with your EPA Cert Rep if the EPA lab has received notification about this submission.

# Ex. 6

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Giles, Michael (EEO)"

<michael.giles@vw To

.com> Verify Help Desk@CSC

CC

07/03/2012 03:55

PM Subject

RE: VW Group - Supplemental Information (HLP-2708)

Thanks, I have re-submitted the information.

The new transaction ID is:

Transaction Id: \_2a619ae9-752b-49ec-999b-1cd3204e1e87

Please let me know if it gets through ok.

----Original Message---From: Ex. 6 @csc.com] On Behalf Of Verify Help Desk
Sent: Tuesday, July 03, 2012 3:41 PM
To: Giles, Michael (EEO)

Subject: Re: VW Group - Supplemental Information (HLP-2708)

Hello Mr. Giles,

We have verified that your supplemental information submitted on June 25 is in the system and your submission should have prompted notification to the

lab. Please make your supplemental information submission again as a Correction and this should send the notification to the lab.

Ex. 6

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

Verify Help Desk

Sent by: Ex. 6

Ex. 6

"Giles, Michael (EEO)"

<michael.giles@vw.com>
07/03/2012 12:09

CC

PM Subject

Re: VW Group - Supplemental Information (HLP-2708) (Document

link: Verify Help Desk)

Hello Mr. Giles,

Verify help desk ticket HLP-2708 was opened for your inquiry. We will look into this and get back to you shortly.

Ex. 6

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Giles, Michael
(EEO)"
<michael.giles@vw To
.com> Verify Help Desk@CSC
cc
07/03/2012 10:59
AM Subject

VW Group - Supplemental Information

Last week on June 25th, we submitted a supplemental information data set for the Jetta 1.4L Hybrid, which was

accepted (Transaction Identifier:

\_510f17c4-79a9-447c-8bd2-888ebb5505c5).

Normally we would then receive a test date from the lab. After inquiry, our certification rep at EPA has informed us that the lab did not receive notification about this submission.

Can you check this and let me know if there is something else I need to do to get a test date?

Thanks, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de]; Rech, Lothar (I/EA-523)"
Hello Jim:
Attached please find a copy of the report from our conference call concerning the MPI/FSI Injection System. I realize that you were the sole EPA participant, but you may wish to distribute the report as you see fit.
Please let me know if you have any additional questions or comments.
Best regards,
Len
Leonard W. Kata
Manager, Emission Regulations and Certification
Engineering and Environmental Office
Volkswagen Group of America, Inc.
Phone: (248) 754-4204
Cell: (248) 797-3886
E-Mail: leonard.kata@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Mon 7/16/2012 11:49:25 AM

Subject: VW Group - Decision Information Submitted for Audi Q5 Hybrid VID DHUB-Q5H

Hello Jim,

We have submitted a Decision Information for the 2013 Audi Q5 Hybrid, VID DHUB-Q5H. This is a new test vehicle that replaces the 2012 model previously tested at EPA. No significant changes have been made to the vehicle design. Manufacturer confirmatory tests are required for FTP and HWY due to high fuel economy for the ETW.

Regards,

**Bill Rodgers** 

VWGoA EEO

(248) 754-4219

To: richard.thomas@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com[];

liver.schmidt@vw.com[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Thur 7/19/2012 9:36:12 PM

**Subject:** re: 2013 FE Guide - Data in EPA's Verify data base as of 7/17/2012 attached;

VW Group 2013 FEGuide-all-rel-dates-no-sales-7-17-2012.xlsx

Richard,

Thanks for making corrections and updating your 2013 labels over the past two weeks. Our macro didn't pick up any errors in the data currently in Verify.

Attached is a spreadsheet with all the 2013 FE Labels in Verify as of July 17, 2012.

Note that (as will be outlined in a forthcoming EPA guidance letter) the last day for manufacturers to make changes for the 2013 Printed Guide is August 29, 2012.

FYI----I'll include my previous email message to you from July 2, 2012 since it has a few more details about calculating fuel consumption value (gallons/100 miles).

As usual, thanks for your help.

Dave

From: David Good/AA/USEPA/US
To: richard.thomas@vw.com

Cc: oliver.schmidt@vw.com, Jim Snyder/AA/USEPA/US@EPA, Roberts French/AA/USEPA/US@EPA

Date: 07/03/2012 12:10 PM

Subject: re: 2013 FE Guide Errors in Verify; Many errors when calculating adjusted combined fuel consumption(gal/100 miles); Request to update any 2013 Labels submitted before May 11, 2012

Richard,

As we discussed over the phone yesterday---you were one of the few manufacturers who calculated fuel consumption correctly---good Job!

Dave

1. Errors in Verify: Attached is a spreadsheet with the 2013 FE Label errors in Verify as of June 29, 2012. The spreadsheet contains all the 2013 FE Label data in Verify as of June 29, 2012 including some of the new Release 10 fields (columns 141-184). Color coding is explained in the heading for each column, except for the various shades of green. Labels with errors are highlighted in green fill in the first few columns or almost all columns---with the field where the error occurred highlighted in yellow fill. [Normal Green (not pea green) means the error occurred in the Combined Adjusted Fuel Consumption (gal/100 miles) field.]

When you get a chance, please correct the errors--so I can forward the corrected data to DOE for posting on the web on the 1st and 15th of each month.

2. Errors in Combined Adjusted Fuel Consumption: I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption" (column 165 of the attached spreadsheet). EPA calculated fuel consumption is in column 166. Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some manufacturers are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as prominently displayed on 2013 labels (window stickers)---as explained in more detail in Item 3, below.

When you get a chance, please correct the fuel consumption errors in Verify. [Note that I'm not currently sending fuel consumption values to DOE for posting on the web, so I don't need the fuel consumption errors corrected immediately. Please correct them as soon as possible, but if you need 2-3 weeks to correct them, that's OK with me.]

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

3. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

4. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at www.fueleconomy.gov to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values, adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. For this reason, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).

If possible, please try to update those labels before August 6, 2012. Please call or email me if you need more time to update your labels.

# Thanks

[attachment "VW\_Group\_2013 FEGuide1-all rel dates-no-sales-06-29-2012 PLUS new Rel10 fields.xlsx" deleted by David Good/AA/USEPA/US]

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: Stephen Healy/AA/USEPA/US@EPA;"Giles, Michael (EEO)"

[michael.giles@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]

From: "Rodgers, William (EEO)"
Sent: Thur 7/26/2012 2:57:49 PM

Subject: VW Group - Certificate Request for 2013 Audi Q5 Hybrid

Hello Jim,

We have submitted a Certificate Request for Audi test group DADXT02.0HUB, Audi Q5 Hybrid. The Initial Application and required manufacturer confirmatory tests have been submitted to Verify. Please review and process a Certificate of Conformity by August 3rd if possible. You can contact me directly if there are any questions about these submissions.

Best regards,

**Bill Rodgers** 

**Emissions Certification Specialist** 

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

	Jim Snyder/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA[]; obert use/AA/USEPA/US@EPA[]		
From: Sent: Subject:	"Giles, Michael (EEO)" Tue 7/31/2012 5:50:53 PM VW Group - Simple question about Test Data (Fuel Economy)		
	The crosp campic queedon about rest bate (t as becauting)		
Hello Jim	Hello Jim and Robert,		
	Could you help clarify a question I have about the data elements related to FE in the test data xml reports from VERIFY (?)		
Could you explain the difference between "MFR FE" and "RoundedAdjustedFuelEconomyValue" tags found within the "EPAGeneratedEmissionTestDetails" section of the xml?			
	est data set for a HWY test where these values differ, and I need to know which is appropriate to AFÉ type combined FE calculation).		
Thanks!			
Mike			
Michael G	iiles		
Certificati	on Specialist		
Engineeri	ng and Environmental Office		
Volkswag	en Group of America, Inc.		
3800 Hamlin Road			
	ills, MI 48326		
United Sta	ates of America		

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Cc:	Jim Snyder/AA/USEPA/US@EPA[] "Giles, Michael (EEO)" [michael.giles@vw.com]		
From: Sent:	"Rodgers, William (EEO)" Tue 7/31/2012 6:16:06 PM		
Subject:	VW Group - Audi Tests and Decision Information Submitted		
Hi Jim,			
I submitted the Audi 4.0I turbo tests we discussed along with the following Decision Information:			
VID D3UF-	VID D3UF-DAQ-0, Audi A8L 5,000 ETW ;		
We submitted FTP and US06 with Stop-Start active. These accompany the Stop-Start Deactivated tests already confirmed at EPA. A manufacturer retest is required for the FTP.			
VID D3UF-	VID D3UF-DAQ-1, Audi A8 normal wheelbase, 4750 ETW;		
We submitted FTP and US06 with Stop-Start active, plus a full array of tests with Stop-Start Deactivated. Manufacturer retests are required for both FTP's and the Hwy test.			
Please revi	ew and let us know your confirmatory testing decision.		
Regards,			
Bill Rodger	s		
Emissions	Certification Specialist		
VOLKSWAG	GEN GROUP OF AMERICA, INC.		
Engineerin	Engineering and Environmental Office		
Auburn Hills, MI			
(248) 754-4219			
william.roo	dgers@vw.com		

**From:** "Rodgers, William (EEO)" **Sent:** Thur 8/2/2012 12:18:34 PM

**Subject:** Confirmatory Tests for D3UJ-DAD/0

Hi Jim,

Thanks for the phone message regarding your decision to waive testing for VID: D3UJ-DAD/0, Test group DADXV04.03UJ.

As an experiment to solve the issue of missing confirmatory tests in Verify, I was successful in updating the Decision Information file again to now include the following EPA confirmatory tests in the set. Check your system and let me know if you now see all tests.

DADX91001362 - 90

DADX91001363 - 90

DADX91001370 - 21

DADX91001371 - 3

Regards,

**Bill Rodgers** 

**Emissions Certification Specialist** 

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]

**From:** "Giles, Michael (EEO)" **Sent:** Fri 8/3/2012 5:48:05 PM

Subject: FW: Certificate DADXT02.0HUB-019 with Evap Family DADXR0155B8H has been

issued

Hi Jim,

If I remember correctly, usually when we get the "certificate has been issued" email message, the PDF certificate is available from VERIFY (through a link in the inbox). For the test group below, I found no corresponding email in my VERIFY account. So, I requested a report for the certificate dataset but received only xml files in the email.

Can help me to get the PDF copy of the signed certificate? I will need to send it to ARB soon so that they can complete their review.

Note - Bill submitted the request so it may be in his inbox - but he is out of the office.

Thanks, Mike

----Original Message----

From: no-reply@epa.gov [mailto:no-reply@epa.gov]

Sent: Friday, August 03, 2012 7:38 AM

To: Rodgers, William (EEO); Giles, Michael (EEO); Hart, Robert (VWoA)

Subject: Certificate DADXT02.0HUB-019 with Evap Family DADXR0155B8H has been issued

The following is a courtesy copy of status message for a Verify submission. Any references made to links refer to links which will appear in the CDX Inbox message.

Certificate Number DADXT02.0HUB-019 with Evaporative Family DADXR0155B8H has been issued. A copy of the signed certificate is attached below. If you would like to have the certificate in an alternate 508 Compliant PDF format, please contact the Verify Help Desk.

The Verify submission this message relates to has the following values:

Test Group Name: DADXT02.0HUB

The following transaction identifier has been assigned to this request:

\_7d31a080-8976-48ee-9fb7-7300f725ce1f

Please do not reply to this message.

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Mon 8/6/2012 12:02:02 PM

Subject: RE: VW Group - Certificate Request for 2013 Audi Q5 Hybrid

snyder.jim@epa.gov William.Rodgers@vw.com michael.giles@vw.com william.rodgers@vw.com

Hello Jim,

The projected sales for 2013 model year Q5 hybrid are correct in the application. The market introduction for the 2012 model year Q5 hybrid was cancelled for reasons unknown to me at this time.

Also, we did finally receive the 2013 certificate in from Verify as referenced by Mike Giles last week.

Thanks,

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, August 02, 2012 6:28 PM

To: Rodgers, William (EEO)

Subject: Re: VW Group - Certificate Request for 2013 Audi Q5 Hybrid

Bill, Was looking at the projected sales in the Part 1. Are these numbers correct? What were the volumes from 2012MY?

2013 MY

Projected Sales by Carline, Test Weight and Transmission Configuration

Ex. 4 - CBI

Jim Snyder Light-Duty Vehicle Group Compliance Division United States Environmental Protection Agency

1

(734) 214-4946 snyder.jim@epa.gov

From: "Rodgers, William (EEO)" < William.Rodgers@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: Stephen Healy/AA/USEPA/US@EPA, "Giles, Michael (EEO)" <michael.giles@vw.com>

Date: 07/26/2012 10:58 AM

Subject: VW Group - Certificate Request for 2013 Audi Q5 Hybrid

## Hello Jim,

We have submitted a Certificate Request for Audi test group DADXT02.0HUB, Audi Q5 Hybrid. The Initial Application and required manufacturer confirmatory tests have been submitted to Verify. Please review and process a Certificate of Conformity by August 3rd if possible. You can contact me directly if there are any questions about these submissions.

Best regards,

Bill Rodgers Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC. Engineering and Environmental Office Auburn Hills, MI (248) 754-4219 william.rodgers@vw.com To: CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;CN=Linc

Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen

Healy/OU=AA/O=USEPA/C=US@EPA; stuart.johnson@vw.com; CN=Tom

Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;CN=Linc

Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen

Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom

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Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen

Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom

Anderson/OU=AA/O=USEPA/C=US@EPA[]; tuart.johnson@vw.com;CN=Tom

Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom

Anderson/OU=AA/O=USEPA/C=US@EPA[]

Cc: CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel

Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel

Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert

Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];

N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel

Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert

Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];

N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert

Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];

N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[];

N=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William

Ott/OU=AA/O=USEPA/C=US@EPA[]; N=William Ott/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Tue 8/7/2012 4:06:59 PM

Subject: VW/EPA mtg - Merger of VW & Porsche

2015-011272 003547

To: "Johnson, Stuart (EEO)" [Stuart.Johnson@vw.com]

**Cc:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Tue 8/7/2012 4:13:44 PM

Subject: Re: VW Porsche Aggregation Meeting - Thurs (8/9/12) at 3:30 PM

Stuart,

I included you, Len and Oliver when I scheduled the Thurs 3:30 meeting---didn't know exactly who would be coming. Please let me know if you think you'll need more than 1.5 hours.

[I invited some of our new engineers---and cc'd a few EPA folks that I don't expect will need to come.]

If possible, please send use the presentation or a one-pager ahead of time.

Also, for some reason I don't have your phone number.

See you Thursday.

Dave

From: "Johnson, Stuart (EEO)" <Stuart.Johnson@vw.com>

To: David Good/AA/USEPA/US@EPA

Date: 08/06/2012 01:08 PM

Subject: VW Porsche Aggregation Meeting

Hello Dave,

Good to talk to you today. I wanted to confirm a meeting with EPA on Thursday August 9th @ 3:30 pm to discuss the implications of the merger of VW and Porsche. We would like to discuss all aspects of the merger as it pertains to regulatory requirements but in particular we would like to discuss the merger with regards timing of aggregating for the GHG regulation. When we review the regulation there seems to be uncertainty regarding when VW and Porsche with have to merge their fleets.

Thank you and looking forward to the discussion this Thursday.

Best Regards,

Stuart

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]; Kata, Leonard (EEO)"

[Leonard.Kata@vw.com]

From: "Rodgers, William (EEO)"
Sent: Tue 8/7/2012 7:23:08 PM

Subject: VW Group - Jetta Hybrid Application for Certification

Hello Jim,

We have submitted to Verify the Initial Application for Certification for the 2013 VW Jetta Hybrid. Please note that we are requesting a Conditional Certificate for this test group due to the tight schedule between market introduction and pending EPA confirmatory testing. Please review this information at your earliest convenience and contact me directly should you have any questions.

Regards,

**Bill Rodgers** 

**Emissions Certification Specialist** 

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Fri 8/10/2012 3:02:02 PM

Subject: EPA Confirmatory Test CO2 Bag Data

Hello Jim,

Can you confirm if CO2 bag data will now be included in the Verify generated XML test reports for confirmatory tests conducted at EPA. It's currently required by manufacturers to input this data in Verify for Manufacturer performed tests but last EPA test reports we pulled from May did not include the CO2 bag data. We need the data to calculating 5-cycle fuel economy labels when confirmatory tests apply.

Thanks,

**Bill Rodgers** 

VWGoA EEO

(248) 754-4219

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Mon 8/13/2012 11:30:51 AM

Subject: RE: Bentley cert

snyder.jim@epa.gov

Jim,

Earlier in the week would be preferred. Production is scheduled for Aug. 20th and we still have to get ARB to sign off after we get a Certificate. Let me know if that's a problem.

Thanks,

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Friday, August 10, 2012 6:15 PM

To: Rodgers, William (EEO) Subject: Bentley cert

Bill, the filing fee appeared today for the Bentley but I haven't looked at it much yet. Any rush or can it wait to later next week?

Jim Snyder Light-Duty Vehicle Group Compliance Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov To: "Giles, Michael (EEO)" [michael.giles@vw.com]
Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]
From: CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US

**Sent:** Wed 8/15/2012 6:15:33 PM

**Subject:** Re: VW Group - Simple question about Test Data (Fuel Economy)

MFR\_FE is a value that a manufacturer (you) enters when entering the test data.

RoundedAdjustedFueEconomyValue is the official fuel economy value calculated by Verify.

When a test is done by our lab, our lab's computer enters the MFR\_FE value into the test submission. However, our lab does not differentiate who or what the test is being used for. For example, they don't know if the test is being submitted for a light duty or heavy duty vehicle, or what the standard is that they are comparing each emission constituent against. It just isn't programmed into their system.

Rounding for each emission constituent is based on 1 more decimal place than the regulation specifies for that emission constituent. Because our lab doesn't know what standard it is being compared against, they don't know what to round each emission to. Their fuel economy calculations in many cases will be based on unrounded values.

The RAFE value (Rounded Adjusted) is calculated by Verify and has each emission constituent rounded to the correct precision before calculation.

So when calculating your label or CAFE values always use the RAFE values for all tests including your own tests.

Robert Peavyhouse Compliance Division U.S. EPA - Office of Transportation and Air Quality

phone: (734) 214-4814 fax: (734) 214-4053

email: peavyhouse.robert@epa.gov website: http://www.epa.gov/nvfel/

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA

Date: 07/31/2012 01:54 PM

Subject: VW Group - Simple question about Test Data (Fuel Economy)

Hello Jim and Robert,

Could you help clarify a question I have about the data elements related to FE in the test data xml reports from VERIFY (?)

Could you explain the difference between "MFR FE" and "RoundedAdjustedFuelEconomyValue" tags found within the "EPAGeneratedEmissionTestDetails" section of the xml?

I have a test data set for a HWY test where these values differ, and I need to know which is appropriate to use (for CAFÉ type combined FE calculation).

Thanks! Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Robert Peavyhouse/AA/USEPA/US@EPA[]

Cc: Jim Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)"

[William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com];

Thomas, Richard (EEO)" [Richard.Thomas@vw.com]

**From:** "Giles, Michael (EEO)" **Sent:** Wed 8/15/2012 6:49:31 PM

**Subject:** RE: VW Group - Simple question about Test Data (Fuel Economy)

peavyhouse.robert@epa.gov http://www.epa.gov/nvfel/ michael.giles@vw.com

Во	b,

Thank you for the follow up, this is helpful for our internal checks.

Regards

Mike

From: Robert Peavyhouse [mailto:Peavyhouse.Robert@epamail.epa.gov]

Sent: Wednesday, August 15, 2012 2:16 PM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: Re: VW Group - Simple question about Test Data (Fuel Economy)

MFR\_FE is a value that a manufacturer (you) enters when entering the test data.

RoundedAdjustedFueEconomyValue is the official fuel economy value calculated by Verify.

When a test is done by our lab, our lab's computer enters the MFR\_FE value into the test submission. However, our lab does not differentiate who or what the test is being used for. For example, they don't know if the test is being submitted for a light duty or heavy duty vehicle, or what the standard is that they are comparing each emission constituent against. It just isn't programmed into their system.

Rounding for each emission constituent is based on 1 more decimal place than the regulation specifies for that emission constituent. Because our lab doesn't know what standard it is being compared against, they don't know what to round each emission to. Their fuel economy calculations in many cases will be based on unrounded values.

The RAFE value (Rounded Adjusted) is calculated by Verify and has each emission constituent rounded to the correct precision before calculation.

So when calculating your label or CAFE values always use the RAFE values for all tests including your own tests.

Robert Peavyhouse
Compliance Division
U.S. EPA - Office of Transportation and Air Quality

phone: (734) 214-4814 fax: (734) 214-4053

email: peavyhouse.robert@epa.gov website: http://www.epa.gov/nvfel/

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA

Date: 07/31/2012 01:54 PM

Subject: VW Group - Simple question about Test Data (Fuel Economy)

Hello Jim and Robert,

Could you help clarify a question I have about the data elements related to FE in the test data xml reports from VERIFY (?)

Could you explain the difference between "MFR FE" and "RoundedAdjustedFuelEconomyValue" tags found within the "EPAGeneratedEmissionTestDetails" section of the xml?

I have a test data set for a HWY test where these values differ, and I need to know which is appropriate to use (for CAFÉ type combined FE calculation).

Thanks! Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: richard.thomas@vw.com[]

Cc: oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Fri 8/17/2012 7:06:21 PM

Subject: re: 2013 FE Guide - Errors in EPA's data base as of Aug 15, 2012; last day to make

corrections for the Printed Guide is Aug 29, 2012

VW Group 2013 FE Guide-all rel dates-no-sales-8-15-2012.xlsx

## Richard

I'll send you the data in Verify as of Aug 15---even though I sent you an updated dataset yesterday. The Aug 15 dataset was double checked more thoroughly, includes the possible error regarding Stop-Start vehicles, etc. Thanks for your help correcting errors over the past month or so.

Attached are the data in Verify as of Aug 15, 2012. Please make any needed corrections (including corrections to the Verify Release 10 fields) as soon as possible. The last day to make corrections for the Printed Guide is August 29, 2012. Labels with pea green fill in the first few columns were not sent to DOE on Aug 16, 2012 for posting on the web. In the future, labels with pea green or dark green fill in the first few columns will not be sent to DOE for posting on the web. (Pea green fill means the error occurred in one of the Verify Release 9 fields. Dark green fill means an error occurred in one of the new Verify Release 10 fields.)

As you begin to correct the errors, please let me know if you need an up-to-date query of the data in Verify--e.g. next week or so and I'll be glad to email it to you.

Placeholder vehicles for the 2013 Printed Guide: As a reminder, please email me an excel spreadsheet with any 2013 alternative fuel/new technology placeholder vehicles (2013 vehicles for which the fuel economy will not be available by August 29, 2012)---including diesel vehicles, CNG vehicles, Electric vehicles, conventional hybrid vehicles, plug-in hybrid vehicles, FFVs and fuel cell vehicles. For more information about sending us your placeholder vehicles, please see Enclosure 2, Section 3 of the recent EPA guidance letter which was sent out on Monday (CD-12-10 Subject: Fuel Economy Label Information for 2013 Model Year). I need a spreadsheet with your placeholder vehicles by August 29, 2012.

I'll include my (edited) notes from previous emails for your convenience.

As usual, thanks for your help.

Dave

Edited notes from my previous email messages:

- 1. Correcting Errors: As usual, the errors and my comments are shown in the first two columns of the spreadsheet. Green fill in the first few columns means our macro detected an error. Labels with errors will not be included in the 2013 Printed Guide until the errors are corrected.
- 2. Voluntarily lowered Fuel Economy: For labels which you voluntarily lowered the mpg of your vehicles, EPA regulations require that you also increase the CO2 accordingly. Calculating the voluntarily increased combined CO2 value is fairly easy (knowing the unrounded adjusted mpg value, the rounded, voluntarily lowered mpg value, and the unrounded adjusted CO2 value). Our macro will check the voluntarily

increased city, highway and combined CO2 value for errors using the formula in the following example:

## Given:

unrounded adjusted combined mpg = 21.6949 mpg unrounded adjusted combined CO2 = 408.4 gpm Voluntarily lowered Label mpg = 20 mpg

Then: Voluntarily increased CO2 = (21.6949 mpg x 408.4 gpm) / 20 mpg = 443.01 gpm; which rounds to 443 gpm CO2

3. Errors in Combined Adjusted Fuel Consumption: As indicated in a previous email to most manufacturers, I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption." Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as listed prominently on the 2013 labels (window stickers)---as explained in more detail in Item 4, below.

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

4. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

5. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at www.fueleconomy.gov to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values, adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. In addition, the Greenhouse Gas 1-10 score will be shown in the 2013 Printed Guide. For these reasons, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).

To: Cc: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Thomas, Richard (EEO)" Richard.Thomas@vw.com] "Giles, Michael (EEO)" Fri 8/17/2012 8:40:57 PM VW Geroup - MY2013 Bentley Decision Information
Hello Jim	
turbo engi	omitted decision information for Flex-fuel MY 2013 Bentley Continental GTC and GT with 6.0L ne, for test group DBEXV06.04UC. A total of 4 configurations were submitted (2 weight classes tests = 4 configs). New exhaust tests for both EDV and FEDV with both gasoline and ethanol ubmitted.
	e this is a carryover from the MY 11 BBEXv06.0501 test group, but with updated engine and an 8 speed transmission.
	ise of your decision as soon as you have a chance, as this will help us with scheduling. Also as ase call me if you have any questions about this.
Thanks!	
Mike	
Michael Gi	les
Certificatio	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	lin Road
Auburn Hil	ls, MI 48326
United Sta	tes of America
Phone +1-1	248-754-4229

FAX +1-248-754-4207

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]; Kata, Leonard (EEO)"

[Leonard.Kata@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Mon 8/20/2012 4:04:58 PM

**Subject:** VW Group - Confirmatory Test Decision Information for Audi 2.0TFSI FFV

Hello Jim,

I have submitted all tests and Decision Information files for the follow (new) 2013 Audi FFV test group DADXJ02.0FUB. The Audi Q5 SUV will be added to the test group later, hence the "J" test group name. Only E85 exhaust tests and E10 EVAP tests have been submitted because we are using carry-across gasoline tests from the existing gasoline-only test group DADXV02.03UB. The related VID's are as follows:

DFUB-BAA, Configuration 1 – EDV - Audi A4 Allroad quattro

DFUD-BAQ, Configuration 2 – FEDV - Audi A4 quattro / A5 quattro

DFUB-BAQ, Configuration 3 - FEDV / EVAP - Audi A5 Cabrio quattro

We are under a time crunch to certify and produce fuel economy labels for these, so your earliest attention would be greatly appreciated.

Regards,

**Bill Rodgers** 

VWGoA EEO

(248) 754-4219

**From:** "Giles, Michael (EEO)" **Sent:** Tue 8/21/2012 3:29:45 PM

Subject: FW: Confirmatory Test Waived (BY77623/13 / 1)

Hello Jim,

We waivers for 3 of the 4 configurations here (thank you)! Can you confirm status for configuration #3?

Thanks, Mike

----Original Message-----

From: no-reply@epa.gov [mailto:no-reply@epa.gov]

Sent: Tuesday, August 21, 2012 11:12 AM

To: Rodgers, William (EEO); Giles, Michael (EEO); Hart, Robert (VWoA); Thomas, Richard (EEO); VWoA EEO

Government

Subject: Confirmatory Test Waived (BY77623/13 / 1)

The following is a courtesy copy of status message for a Verify submission. Any references made to links refer to links which will appear in the CDX Inbox message.

Confirmatory Test for the following Vehicle has been Waived:

Manufacturer: BEX Vehicle ID: BY77623/13 Vehicle Configuration: 1

The Verify submission this message relates to has the following values:

Vehicle ID: BY77623/13

Vehicle Configuration #: 1

Test Group Name: DBEXV06.04UC

The following transaction identifier has been assigned to this request:

\_4f93cd18-f551-4a99-8e45-ed343d011a56

Please do not reply to this message.

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]; Thomas, Richard (EEO)"

[Richard.Thomas@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Wed 8/22/2012 7:43:47 PM

Subject: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hello Jim,

I have submitted the Initial Application and confirmatory test Decision Information for the following 2013 Audi flex-fuel Test Group/Evaporative Family. All tests have been submitted including manufacturer confirmatory tests. This test group was recently selected for EPA confirmatory EVAP testing.

As previously discussed, this flex-fuel test group uses carry across gasoline test data from the test group DADXV02.03UB which has been verified to have identical engine and transmission programming for gasoline operation.

We are requesting a conditional certificate be issue as soon as possible due to a very tight port release deadline as early as August 31st.

Test Group: DADXJ02.0FUB

Evap. Family: DADXR0140B8F

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

To: michael.giles@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]
From: CN=DavidA Wright/OU=AA/O=USEPA/C=US

**Sent:** Wed 8/22/2012 7:53:52 PM **Subject:** Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

 Mfr.
 Vehicle ID
 Test Date
 Manuf. Test Number

 Audi
 VW465 790007/09
 12/09/11
 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

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\*

To: "Giles, Michael (EEO)" [michael.giles@ww.com]
Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]
From: CN=DavidA Wright/OU=AA/O=USEPA/C=US

**Sent:** Thur 8/23/2012 1:09:20 PM

Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

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\*

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA
Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 08/23/2012 08:05 AM

Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 3:54 PM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

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Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

From: "Rodgers, William (EEO)"
Sent: Thur 8/23/2012 1:50:01 PM

Subject: RE: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hi Jim,

I should clarify that I have described Audi Q5 in this Application but have not yet submitted E85 test data for the model. We anticipate data in the coming weeks, at which time you had mentioned possibly selecting it for EVAP confirmatory testing to coincide with the already selected A5 Cabrio EVAP confirmatory tests from this test group.

Considering that the certificate would be conditional with or without Q5 included, I propose the Certificate be issued as requested (with Q5) to allow vehicles to be Labeled and shipped immediately IF we receive a test waiver from you for the E85 exhaust tests.

Sorry for the confusion.

Bill

From: Rodgers, William (EEO)

Sent: Wednesday, August 22, 2012 3:44 PM To: "Jim Snyder' (Snyder.Jim@epamail.epa.gov)"

Cc: Giles, Michael; Thomas, Richard (EEO); Kata, Leonard (EEO)

Subject: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hello Jim,

I have submitted the Initial Application and confirmatory test Decision Information for the following 2013 Audi flex-fuel Test Group/Evaporative Family. All tests have been submitted including manufacturer confirmatory tests. This test group was recently selected for EPA confirmatory EVAP testing.

As previously discussed, this flex-fuel test group uses carry across gasoline test data from the test group DADXV02.03UB which has been verified to have identical engine and transmission programming for gasoline operation.

We are requesting a conditional certificate be issue as soon as possible due to a very tight port release deadline as early as August 31st.

Test Group: DADXJ02.0FUB

Evap. Family: DADXR0140B8F

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**From:** "Rodgers, William (EEO)" **Sent:** Mon 8/27/2012 12:54:14 PM

Subject: RE: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

snyder.jim@epa.gov William.Rodgers@vw.com michael.giles@vw.com Snyder.Jim@epamail.epa.gov

Thanks Jim.

I will be resubmitting the CSI and Cert Request without Q5 included this morning.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Friday, August 24, 2012 11:00 AM

To: Rodgers, William (EEO) Cc: Giles, Michael (EEO)

Subject: RE: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Bill, I talked to Mike about this but here's the story. Even though it is a Conditional Cert, I don't think I can include the Q5 on the certificate until you have at least submitted data on the Q5 since it will be the new EDV. The Conditional provision is only intended for vehicles pending a confirmatory test. I will deny the cert request and you can re-submit it without the Q5.

Jim Snyder Light-Duty Vehicle Group Compliance Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Rodgers, William (EEO)" < William.Rodgers@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>

Date: 08/23/2012 09:50 AM

Subject: RE: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hi Jim,

I should clarify that I have described Audi Q5 in this Application but have not yet submitted E85 test data

for the model. We anticipate data in the coming weeks, at which time you had mentioned possibly selecting it for EVAP confirmatory testing to coincide with the already selected A5 Cabrio EVAP confirmatory tests from this test group.

Considering that the certificate would be conditional with or without Q5 included, I propose the Certificate be issued as requested (with Q5) to allow vehicles to be Labeled and shipped immediately IF we receive a test waiver from you for the E85 exhaust tests.

Sorry for the confusion.

From: Rodgers, William (EEO)

Sent: Wednesday, August 22, 2012 3:44 PM To: "Jim Snyder' (Snyder.Jim@epamail.epa.gov)"

Cc: Giles, Michael; Thomas, Richard (EEO); Kata, Leonard (EEO)

Subject: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

## Hello Jim,

I have submitted the Initial Application and confirmatory test Decision Information for the following 2013 Audi flex-fuel Test Group/Evaporative Family. All tests have been submitted including manufacturer confirmatory tests. This test group was recently selected for EPA confirmatory EVAP testing.

As previously discussed, this flex-fuel test group uses carry across gasoline test data from the test group DADXV02.03UB which has been verified to have identical engine and transmission programming for gasoline operation.

We are requesting a conditional certificate be issue as soon as possible due to a very tight port release deadline as early as August 31st.

Test Group: DADXJ02.0FUB Evap. Family: DADXR0140B8F

Regards, Bill Rodgers VWGoA EEO (248) 754-4219

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Mon 8/27/2012 1:33:33 PM

Subject: FW: EPA Has Denied The Certificate Request for TG: DADXJ02.0FUB Evap:

DADXR0140B8F

Hi Jim,

I have resubmitted the below mentioned CSI and Cert Request, excluding the Audi Q5. We are under a tight deadline on this one so if there are any questions please let me know as soon as possible. I will revise the application later in the week when the Q5 is added back in with a running change.

Thanks, Bill

----Original Message----

From: no-reply@epa.gov [mailto:no-reply@epa.gov]

Sent: Friday, August 24, 2012 11:07 AM

To: Rodgers, William (EEO); Giles, Michael (EEO); Hart, Robert (VWoA)

Subject: EPA Has Denied The Certificate Request for TG: DADXJ02.0FUB Evap: DADXR0140B8F

The following is a courtesy copy of status message for a Verify submission. Any references made to links refer to links which will appear in the CDX Inbox message.

The certificate request for Test Group DADXJ02.0FUB and Evaporative Family DADXR0140B8F has been denied. Contact your CISD compliance representative for additional information.

The Verify submission this message relates to has the following values:

Test Group Name: DADXJ02.0FUB

The following transaction identifier has been assigned to this request:

\_dc4ad1fd-55b8-4f72-a268-45e0914dc52c

Please do not reply to this message.

To: DavidA Wright/AA/USEPA/US@EPA[]
Cc: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"

Sent: Wed 9/5/2012 12:36:44 PM

Subject: RE: Request for US06 Drive Trace

Copy of US06 Trace.xlsm michael.giles@vw.com mailto:Wright.DavidA@epamail.epa.gov image001.gif

Hello David,
Please find attached the drive trace that the factory provided for this test.
Regards,
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Thursday, August 23, 2012 9:09 AM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright U.S. EPA - OTAQ

Compliance Division, Light-Duty Vehicle Center 2565 Plymouth Road Ann Arbor, Michigan 48105 734 214-4467 e-mail:wright.davida@epa.gov

\*

This e-mail and any attachment contain information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorized to read, copy or use this e-mail or any attachment. If you have received this e-mail in error, please destroy it and notify the sender by return mail.

"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA
Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 08/23/2012 08:05 AM

Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 3:54 PM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

This e-mail and any attachment contain information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorized to read, copy or use this e-mail or any attachment. If you have received this e-mail in error, please destroy it and notify the sender by return mail.

To: Willem VandenBroek/AA/USEPA/US@EPA[]

Cc: "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; im

Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers,

William (EEO)" [William.Rodgers@vw.com]

From: "Thomas, Richard (EEO)"

Sent: Wed 9/5/2012 12:40:07 PM

Subject: RE: 2013 Bentley Fee Filing Form

Richard.Thomas@vw.com William.Rodgers@vw.com Richard.Thomas@VW.com image001.gif

image001.gif

Hi Bill;

Thank you for the information, you are correct. We only filed one fee filing form for test group DADXT03.03UG with that April 27th, 2012 electronic payment. The other two fees are for test groups which they are deciding whether they will be model year 2013 or 2014, due to SOP delays. We are waiting for a final decision and applications, and to see if they will be processed this calendar year (2012).

Thanks,

Richard

From: Willem VandenBroek [mailto:VandenBroek.Willem@epamail.epa.gov]

Sent: Friday, August 10, 2012 8:33 AM

To: Thomas, Richard (EEO)

Subject: Re: 2013 Bentley Fee Filing Form

Richard,

Looking over our books, I see we had a \$98,034 ACH payment on 4/27, out of which we paid for DADXT03.03UG, leaving \$65,356 unclaimed. FYI.,

Bill

"Thomas, Richard (EEO)" ---08/09/2012 02:48:40 PM---Please find attached the fee filing form for 2013 Bentley Mulsanne test group DBEXV06.84LA. Electr

From: "Thomas, Richard (EEO)" < Richard. Thomas@vw.com>

To: Fees@EPA

Cc: Willem VandenBroek/AA/USEPA/US@EPA, "Rodgers, William (EEO)" < William.Rodgers@vw.com>

Date: 08/09/2012 02:48 PM

Subject: 2013 Bentley Fee Filing Form

Please find attached the fee filing form for 2013 Bentley Mulsanne test group DBEXV06.84LA. Electronic payment will be made on August 9th, 2012.

Best regards,

Richard E. Thomas
VOLKSWAGEN Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
Engineering and Environmental Office (EEO)

Phone: 248 754-4213 Fax: 248 754-4207

Richard.Thomas@VW.com

[attachment "2013 EPA Cert Fees DBEXV06.84LA to EPA.pdf" deleted by Willem VandenBroek/AA/USEPA/US]

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Wed 9/5/2012 2:47:31 PM

Subject: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Hello Jim,

Just a heads up that we submitted E85 exhaust tests and Decision Information for the VID: DFUB-Q5A (Audi Q5 2.0L FFV). A running change to add this vehicle as the new EDV for this test group is forthcoming. Please let us know as soon as possible if you intent to confirm these tests.

PS - We will be submitting additional Audi Q5 3.0L stop-start test data, including Evap. tests, for another test group in the next day. You had expressed interest in confirming the Evap. tests and scheduling it with the recently selected Evap. tests for VID: DFUB-BAQ (Audi A5 Cabriolet).

Regards,

**Bill Rodgers** 

VWGoA EEO

(248) 754-4219

Snyder/AA/USEPA/US@EPA[]  From: "Giles, Michael (EEO)"  Sent: Wed 9/5/2012 7:37:09 PM  Subject: VW Group - Confirmatory test decision information for VID D3UF-Q	5A
Hello Jim,	
I have submitted decision information for the 3.0L Q5, which is a part of a running charge group DADXJ03.03UF.	ange for Audi test
Vehicle ID: D3UF-Q5A	
New evaporative family: DADXR0140B8B	
Configuration 0: FEDV with start stop active / also used for evaporative tests	
Configuration 1: FEDV with start-stop Inactive	
A running change letter will be submitted today. Manufacturer confirmatory tests a FE for ETW for both configurations.	are required for High
Please let us know EPA confirmatory decision as soon as possible.	
Thanks,	
Mike	
From: Rodgers, William (EEO) Sent: Wednesday, September 05, 2012 10:48 AM To: "Jim Snyder' (Snyder.Jim@epamail.epa.gov)' Cc: Giles, Michael (EEO) Subject: VW Group - Confirmatory test decision information for VID DFUB-Q5A	
Hello Jim,	

1

"Rodgers, William (EEO)" [William.Rodgers@vw.com]; im

To:

Just a heads up that we submitted E85 exhaust tests and Decision Information for the VID: DFUB-Q5A (Audi Q5 2.0L FFV). A running change to add this vehicle as the new EDV for this test group is forthcoming. Please let us know as soon as possible if you intent to confirm these tests.

PS - We will be submitting additional Audi Q5 3.0L stop-start test data, including Evap. tests, for another test group in the next day. You had expressed interest in confirming the Evap. tests and scheduling it with the recently selected Evap. tests for VID: DFUB-BAQ (Audi A5 Cabriolet).

Regards,

**Bill Rodgers** 

**VWGoA EEO** 

(248) 754-4219

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Tue 9/11/2012 1:23:42 PM

**Subject:** VW Group - EVAP Test Schedule

Hello Jim,

We would like to request that the Audi A5 Cabriolet, VID: DFUB-BAQ, selected for Evap testing be scheduled for delivery to EPA on October 29 with testing on October 31.

I am also getting ready to submit new test data for an Audi A8 with 3.0I TDI diesel and stop-start. This will be requested for the week prior (Oct 22nd.) if selected for testing.

Let me know if this A5 schedule works for you.

**Bill Rodgers** 

VWGoA EEO

(248) 754-4219

Sent: Subject:	Tue 9/11/2012 1:54:29 PM Volkswagen Meeting with EPA - Proposal
Hello Jim:	
colleagues and Ms. Ha meeting wi	w, we have some vehicles at EPA next week for confirmatory testing. There are some from VWAG Germany that will accompany the test vehicles. This includes Mr. Juergen Peter nnah Schlueter. I have been asked if it would be possible to have a brief, perhaps one hour, th you and other EPA staff, while Mr. Peter and Ms. Schlueter are in Ann Arbor. The topic tentrate on emission testing, including evaporative emission testing for future advanced vehicles.
	al would be September 20 or 21, 2012, late morning or early afternoon. Please let me know if to meet with us and what time may be most convenient for you.
Best regard	ls,
Len	
Leonard W	
Senior Man	nager
Emission Re	egulations and Certification
Engineering	g and Environmental Office
Volkswager	n Group of America, Inc.
Phone: (24	8) 754-4204
Cell: (248)	797-3886
E-Mail: leoi	nard.kata@vw.com

Jim Snyder/AA/USEPA/US@EPA[] "Kata, Leonard (EEO)"

To: From:

**Cc:** "Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]

From: "Kata, Leonard (EEO)"
Sent: Tue 9/11/2012 8:26:28 PM

Subject: Audi Meeting with EPA - Proposal

Hello Jim:

I wrote to you earlier today to request a meeting with some VWAG colleagues toward the end of next week. I hope that we can work that out. I am writing again to ask for an additional meeting at the end of October. In this case it would be with our colleagues from Audi AG

We propose a meeting at one of the following times:

- · Monday, October 29 2012; afternoon
- · Tuesday, October 30, 2012; morning

We would appreciate a three-hour time slot. Proposed discussion topics include:

- · Field Survey for Idle Start Stop
- · Idle Start / Stop 2nd Generation
- · Idle Start / Stop with Default on vs. Last Mode
- · Drive Select Mode
- · Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- · Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,		
Lon		
Len		

Leonard W. Kata

Senior Manager

**Emission Regulations and Certification** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: "Giles, Michael (EEO)" [michael.giles@vw.com]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=William

Ott/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA[];

N=William Ott/OU=AA/O=USEPA/C=US@EPA;CN=Chris

Nevers/OU=AA/O=USEPA/C=US@EPA[]; N=Chris Nevers/OU=AA/O=USEPA/C=US@EPA[]

From: CN=DavidA Wright/OU=AA/O=USEPA/C=US

Sent: Wed 9/12/2012 12:33:52 PM
Subject: RE: Request for US06 Drive Trace

michael.giles@vw.com mailto:Wright.DavidA@epamail.epa.gov (embedded image)

Mike,

Thank you for your response. I am wondering, if per our original request, if the factory has any 10 hz data, or if the only data available are 1 hz?

EPA may be requesting additional drive trace data from certification tests in the future and will be requesting the data in the format specified by SAEJ2951. Please do not hesitate to contact me if you require additional information or have further questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

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\*

From: "Giles, Michael (EEO)" < michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA
Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 09/05/2012 08:36 AM

Subject: RE: Request for US06 Drive Trace

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards, Mike

1

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Thursday, August 23, 2012 9:09 AM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

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Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 08/23/2012 08:05 AM

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Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 3:54 PM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

"Copy of US06\_Trace.xlsm" deleted by DavidA Wright/AA/USEPA/US]

**From:** "Rodgers, William (EEO)" **Sent:** Wed 9/12/2012 1:37:52 PM

Subject: RE: VW Group - Confirmatory test decision information for VID DFUB-Q5A

snyder.jim@epa.gov William.Rodgers@vw.com michael.giles@vw.com

Thanks Jim, I will resubmit the Q5 Certificate request as conditional. I hadn't thought about that already being conditional.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, September 11, 2012 7:45 PM

To: Rodgers, William (EEO)

Subject: Re: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Bill, I was looking over the running change Certificate request on Test Group DADXJ02.0FUB and noticed it wasn't a conditional. Since its a running change on a conditional certificate I think it has to be a conditional too.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Rodgers, William (EEO)" < William.Rodgers@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Giles, Michael (EEO)" < michael.giles@vw.com>

Date: 09/05/2012 10:47 AM

Subject: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Hello Jim,

Just a heads up that we submitted E85 exhaust tests and Decision Information for the VID: DFUB-Q5A (Audi Q5 2.0L FFV). A running change to add this vehicle as the new EDV for this test group is forthcoming. Please let us know as soon as possible if you intent to confirm these tests.

PS - We will be submitting additional Audi Q5 3.0L stop-start test data, including Evap. tests, for another

test group in the next day. You had expressed interest in confirming the Evap. tests and scheduling it with the recently selected Evap. tests for VID: DFUB-BAQ (Audi A5 Cabriolet).

Regards, Bill Rodgers VWGoA EEO (248) 754-4219

Cc: Verify Help Desk [verifyhelp@csc.com]; Giles, Michael (EEO)"

[michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Wed 9/12/2012 3:03:09 PM

Subject: RE: VW Group - Confirmatory test decision information for VID DFUB-Q5A

snyder.jim@epa.gov William.Rodgers@vw.com michael.giles@vw.com

Jim,

I did receive your Cert request denial but have not been able to access the Verify Certification Request screen to process the revised conditional request. I'll try again later I guess?

PS – I was able to processed a Decision Information correction for the pending A5 Cabriolet Evap test (VID DFUB-BAQ) to change the delivery date to Oct 29th, and also processed the related Supplemental Information with seemingly no Verify problems.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, September 11, 2012 7:45 PM

To: Rodgers, William (EEO)

Subject: Re: VW Group - Confirmatory test decision information for VID DFUB-Q5A

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Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Rodgers, William (EEO)" < William.Rodgers@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>

Date: 09/05/2012 10:47 AM

Subject: VW Group - Confirmatory test decision information for VID DFUB-Q5A

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Regards, Bill Rodgers VWGoA EEO (248) 754-4219

Jim Snvder/AA/USEPA/US@EPA[]
Ex. 7 To:

From:

Wed 9/12/2012 3:42:29 PM Sent:

**Subject:** Accepted: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

From: "Sigelko, Jenny (EEO)"
Sent: Wed 9/12/2012 4:44:11 PM

**Subject:** Accepted: FW: Invitation: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles (Sep 20 01:00 PM EDT in AA-N62-ASD&CD/AA-OTAQ-

OFFICE@EPA) winmail.dat message\_body.rtf

From: Sent: Subject:	"Kata, Leonard (EEO)" Wed 9/12/2012 5:05:09 PM RE: Audi Meeting with EPA - Proposa	I	
Hello Jim:			
I will let my best for yo		it. Otherwise I will wait to hear which date w	orks
Thanks,			
Len			
Leonard W	J. Kata		
Senior Mar	nager		
Emission R	Regulations and Certification		
Engineerin	ng and Environmental Office		
Volkswage	en Group of America, Inc.		
Phone: (24	18) 754-4204		
Cell: (248)	797-3886		
E-Mail: leo	onard.kata@vw.com		

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov] Sent: Wednesday, September 12, 2012 11:38 AM

Jim Snyder/AA/USEPA/US@EPA[]

To:

To: Kata, Leonard (EEO)

Subject: Re: Audi Meeting with EPA - Proposal

Hi Len, I got your note yesterday. I'm just thinking about who to invite since you mentioned Tier 3. We usually try to limit mtgs to 2 hours. I rather push them into condensing their discussion down to that.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Kata, Leonard (EEO)" < Leonard. Kata@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rech, Lothar (I/EA-523)" <Lothar.Rech@AUDI.DE>, "Rist, Domenic (I/EA-523)" <Domenic.Rist@audi.de>,

"Schmidt, Oliver (EEO)" <Oliver.Schmidt@vw.com>

Date: 09/11/2012 04:27 PM

Subject: Audi Meeting with EPA - Proposal

## Hello Jim:

I wrote to you earlier today to request a meeting with some VWAG colleagues toward the end of next week. I hope that we can work that out. I am writing again to ask for an additional meeting at the end of October. In this case it would be with our colleagues from Audi AG

We propose a meeting at one of the following times:

- · Monday, October 29 2012; afternoon
- · Tuesday, October 30, 2012; morning

We would appreciate a three-hour time slot. Proposed discussion topics include:

- · Field Survey for Idle Start Stop
- · Idle Start / Stop 2nd Generation
- · Idle Start / Stop with Default on vs. Last Mode
- · Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- · Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,		
Len		

Leonard W. Kata Senior Manager Emission Regulations and Certification Engineering and Environmental Office Volkswagen Group of America, Inc.

Phone: (248) 754-4204 Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: "Rodgers, William (EEO)" [William.Rodgers@vw.com]

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]; im Snyder/AA/USEPA/US@EPA[]

From: Ex. 6

**Sent:** Wed 9/12/2012 5:13:21 PM

Subject: RE: VW Group - Confirmatory test decision information for VID DFUB-Q5A (HLP-

2914)

Hello Mr. Rodgers,

Verify help desk ticket HLP-2914 has been opened for your inquiry. CDX is still experiencing issues that are impacting submission made in Verify. I will provide an update as soon as I have a status.

# Ex. 6

Verify Help Desk Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Rodgers, William (EEO)" <William.Rodgers@ То vw.com> Jim Snyder <Snyder.Jim@epamail.epa.gov> 09/12/2012 11:03 CC AM Verify Help Desk@CSC, "Giles, Michael (EEO)" <michael.giles@vw.com> Subject RE: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Jim,

I did receive your Cert request denial but have not been able to access the Verify Certification Request screen to process the revised conditional request. I'll try again later I guess?

PS – I was able to processed a Decision Information correction for the pending A5 Cabriolet Evap test (VID DFUB-BAQ) to change the delivery date to Oct 29th, and also processed the related Supplemental Information with seemingly no Verify problems.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, September 11, 2012 7:45 PM

To: Rodgers, William (EEO)

Subject: Re: VW Group - Confirmatory test decision information for VID

DFUB-Q5A

Bill, I was looking over the running change Certificate request on Test Group DADXJ02.0FUB and noticed it wasn't a conditional. Since its a running change on a conditional certificate I think it has to be a conditional too.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Rodgers, William (EEO)" < William.Rodgers@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>

Date: 09/05/2012 10:47 AM

Subject: VW Group - Confirmatory test decision information for VID

DFUB-Q5A

Hello Jim,

Just a heads up that we submitted E85 exhaust tests and Decision Information for the VID: DFUB-Q5A (Audi Q5 2.0L FFV). A running change to add this vehicle as the new EDV for this test group is forthcoming. Please let us know as soon as possible if you intent to confirm these tests.

PS - We will be submitting additional Audi Q5 3.0L stop-start test data, including Evap. tests, for another test group in the next day. You had

expressed interest in confirming the Evap. tests and scheduling it with the recently selected Evap. tests for VID: DFUB-BAQ (Audi A5 Cabriolet).

Regards, Bill Rodgers VWGoA EEO (248) 754-4219 To: Jim Snyder/AA/USEPA/US@EPA[]
From: "Schlueter, Hannah (EASZ/1)"
Sent: Wed 9/12/2012 8:48:05 PM

**Subject:** Zugesagt: FW: Invitation: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles (Sep 20 01:00 PM EDT in AA-N62-ASD&CD/AA-OTAQ-

OFFICE@EPA) winmail.dat

To: Jim Snyder/AA/USEPA/US@EPA[]
Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]
From: "Rodgers, William (EEO)"

From: "Rodgers, William (EEO)"
Sent: Thur 9/13/2012 11:02:03 AM

Subject: VW Group - A5 Cabriolet Evap Test Schedule

Jim,

It appears, after fighting Verify all day yesterday, that I was successful in getting the Supplemental Information processed and corrected the delivery date in the Decision Information for the Audi Cabriolet Evap. test to be scheduled on Oct 31st, VID: DFUB-BAQ.

Please confirm that you have all that is necessary to schedule the test.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

To: Verify Help Desk [verifyhelp@csc.com]
Cc: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William (EEO)"
Sent: Thur 9/13/2012 11:33:09 AM
Subject: Verify test processing error

<u>here</u>

I am unable to process the following test data batch file in Verify since Monday. I can open it in Verify and view the first test just fine, but the error appears once I try to submit the batch. The necessary Vehicle Information for VID: DUG-DAQ configuration 0 and 1 and Fuel Properties was submitted successfully.

Regards,

**Bill Rodgers** 

**Emissions Certification Specialist** 

VOLKSWAGEN GROUP OF AMERICA, INC.

**Engineering and Environmental Office** 

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

There was an unexpected error processing your submission. Please retry your submission at a later date. If you continue to receive this message please contact the Verify Helpdesk. It can be reached through email (verifyhelp@csc.com) or by phone (1-888-890-1995 and choose option 4).

The rejection occurred at Thu Sep 13 07:23:43 EDT 2012 while processing document: \_f8f1e029-0479-4de2-b079-b2f8a8fe322e

Transaction Identifier: f8f1e029-0479-4de2-b079-b2f8a8fe322e

Click here to view the status history.

Thank you for submitting your request to Verify via CDX.

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com] From: "Giles, Michael (EEO)" Thur 9/13/2012 12:29:26 PM Sent: Subject: VW Group - Bentley Application Submitted DBEXV06.04UC Hello Jim, I have submitted the application for new Bentley test group DBEXV06.04UC, which is for the continental GT/GTC carlines. This new test group is a carry-over (across) from urrently certified test group DBEXV06.0501, which has the same evaporative family. The changes for this new test group consist of an 8 speed transmission and a new engine controller. Note – I have submitted both the applications and the certificate request, but have not received confirmation from VERIFY - please advise if you do not have either of these soon. As we discussed yesterday, timing is tight for us on this so as always we would appreciated your quick response. Regards Mike Michael Giles **Certification Specialist Engineering and Environmental Office** Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

From: "Giles, Michael (EEO)"
Sent: Thur 9/13/2012 1:15:00 PM

Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

Hi Jim,

I see that the pdf's were finally accepted. I am hoping that the cert request report comes back soon.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, September 13, 2012 8:43 AM

To: Giles, Michael (EEO)

Subject: Re: VW Group - Bentley Application Submitted DBEXV06.04UC

Hasn't shown up yet.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 09/13/2012 08:29 AM

Subject: VW Group - Bentley Application Submitted DBEXV06.04UC

Hello Jim,

I have submitted the application for new Bentley test group DBEXV06.04UC, which is for the continental GT/GTC carlines. This new test group is a carry-over (across) from urrently certified test group DBEXV06.0501, which has the same evaporative family.

The changes for this new test group consist of an 8 speed transmission and a new engine controller.

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Regards
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

From: "Giles, Michael (EEO)"
Sent: Thur 9/13/2012 2:36:31 PM

Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

[mailto:Snyder.Jim@epamail.epa.gov]

snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

I now have a report that the certificate request was accepted.

From: Giles, Michael (EEO)

Sent: Thursday, September 13, 2012 9:15 AM

To: 'Jim Snyder'

Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

Hi Jim,

I see that the pdf's were finally accepted. I am hoping that the cert request report comes back soon.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, September 13, 2012 8:43 AM

To: Giles, Michael (EEO)

Subject: Re: VW Group - Bentley Application Submitted DBEXV06.04UC

Hasn't shown up yet.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 09/13/2012 08:29 AM

Subject: VW Group - Bentley Application Submitted DBEXV06.04UC

## Hello Jim,

I have submitted the application for new Bentley test group DBEXV06.04UC, which is for the continental GT/GTC carlines. This new test group is a carry-over (across) from urrently certified test group DBEXV06.0501, which has the same evaporative family.

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Note – I have submitted both the applications and the certificate request, but have not received confirmation from VERIFY – please advise if you do not have either of these soon. As we discussed yesterday, timing is tight for us on this so as always we would appreciated your quick response.

Regards
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

From: "Giles, Michael (EEO)"
Sent: Fri 9/14/2012 11:39:42 AM

Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

snyder.jim@epa.gov michael.giles@vw.com [mailto:Snyder.Jim@epamail.epa.gov] snyder.jim@epa.gov michael.giles@vw.com William.Rodgers@vw.com

Jim,

I have a note that fee payment was made electronically today. Please let us know if you have confirmation to proceed.

Thanks,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, September 13, 2012 7:16 PM

To: Giles, Michael (EEO)

Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

The cert request is in verify. I glanced at it and found that the fee payment hasn't shown up yet. Shows VW sent it 8/31.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 09/13/2012 10:36 AM

Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

I now have a report that the certificate request was accepted.

From: Giles, Michael (EEO)

Sent: Thursday, September 13, 2012 9:15 AM

To: 'Jim Snyder'

Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

Hi Jim,

I see that the pdf's were finally accepted. I am hoping that the cert request report comes back soon.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, September 13, 2012 8:43 AM

To: Giles, Michael (EEO)

Subject: Re: VW Group - Bentley Application Submitted DBEXV06.04UC

Hasn't shown up yet.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 09/13/2012 08:29 AM

Subject: VW Group - Bentley Application Submitted DBEXV06.04UC

Hello Jim,

I have submitted the application for new Bentley test group DBEXV06.04UC, which is for the continental GT/GTC carlines. This new test group is a carry-over (across) from urrently certified test group DBEXV06.0501, which has the same evaporative family.

The changes for this new test group consist of an 8 speed transmission and a new engine controller.

Note – I have submitted both the applications and the certificate request, but have not received confirmation from VERIFY – please advise if you do not have either of these soon. As we discussed yesterday, timing is tight for us on

this so as always we would appreciated your quick response.

Regards
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Thomas, Richard (EEO)" **Sent:** Fri 9/14/2012 2:42:05 PM

Subject: FW: Confirmation of Certification Fees Payment Bentley

For your information.

----Original Message-----

From: fees@epa.gov [mailto:fees@epa.gov] Sent: Friday, September 14, 2012 10:22 AM

To: Thomas, Richard (EEO)

Subject: Confirmation of Certification Fees Payment

To the representative for Bentley Motors Ltd.:

Your certification Fee Filing Form(s) submitted for the following family or test group(s) and the associated financial documentation for your payment of \$32678.00 were received on 09/14/2012.

## - DBEXV06.04UC

This message indicates only that EPA has received record of your payment and form(s) for the above certification fee. It does not constitute the granting of a Certificate of Conformity by EPA or convey any information about the status of your certification application for the subject family or test group(s).

Please do not respond to this email. If you have any questions regarding certification of the family or test group(s), please contact your EPA Certification Representative; for questions on fees, contact Fees@epa.gov.

From: "Rodgers, William (EEO)" Sent: Fri 9/14/2012 6:02:28 PM Subject: VW Group - Decision Information Audi A8/A8L TDI Stop-Start Hi Jim, Just a heads up, I was finally able to submit the tests and Decision Information related to the Audi A8/A8L TDI with Stop-Start we discussed. Let me know if you are still interested in testing this vehicle. Regards, **Bill Rodgers Emissions Certification Specialist** VOLKSWAGEN GROUP OF AMERICA, INC. **Engineering and Environmental Office** Auburn Hills, MI (248) 754-4219

william.rodgers@vw.com

To:

Jim Snyder/AA/USEPA/US@EPA[]

To: richard.thomas@vw.com[]

Cc: leonard.kata@vw.com;oliver.schmidt@vw.com;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[];

liver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Aaron

Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[];

N=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Fri 9/14/2012 9:21:01 PM

Subject: re: Question about your 2011 CAFE report

Richard,

We are beginning our review of your 2011 CAFE report and data submittal. The EPA folks who publish the EPA CO2 & Fuel Economy Trends report have asked me why the following vehicles are included in your 2011 Truck CAFE Report (in Verify):

Tiguan (2WD)

As you know, beginning with 2011 CAFE reports, NHTSA regulations & policy requires 2WD SUVs equal to or less than 6000 lbs GVWR will be included in your passenger car CAFE, ref 74 FR 14419, March 30, 2009.

Please let us know as soon as you get a chance. We could use a quick response, if possible, as the 2012 FE Trends report is fast approaching their printing deadline.

Thanks

To: Vincent Mazaitis/AA/USEPA/US@EPA[]

Cc: Jim Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)"

[William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]

From: "Giles, Michael (EEO)"

Sent: Mon 9/17/2012 4:09:58 PM

Subject: VW testing schedule

Hello Vincent,

To follow up from my voice message – would you be able to send a schedule for the testing for our Jetta Hybrid and Beetle TDI? We would like to have 2 or 3 staff there for the start of testing if possible.

Also, we have a new colleague here from Germany, and we would like to request a small tour of your facility (maybe after one of the tests if this works for you).

Please let me know or feel free to call me if you wish to discuss.

Michael Giles

**Certification Specialist** 

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

**From:** "Kata, Leonard (EEO)" **Sent:** Mon 9/17/2012 4:19:11 PM

Subject: Declined: RE: Audi Meeting with EPA

To: Cc: From: Sent: Subject: DADXVJ0	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com] "Giles, Michael (EEO)" Tue 9/18/2012 6:26:12 PM VW Group - Running Change to add Q5 carline for MY13 Audi Test Group 3.03UF
Hello Jim,	
Audi Test g family is sir canister. N	ted a revised application as well as running change letter for the addition of the Q5 carline to group DADXJ03.03UF, with new evaporative family DADXR0140B8B. This new evaporative milar to previously certified evap. family DADXR0140B8A, but now includes a 5 gram bleed lew evaporative tests (EDV) were performed for the Q5 however the supporting exhaust tests are economy only (FEDV).
We have al	so submitted a certificate request for this Q5 addition.
Please let u	us know if you have any questions during your review.
Thanks,	
Mike	
Michael Gil	les
Certificatio	n Specialist
Engineering	g and Environmental Office
Volkswager	n Group of America, Inc.
3800 Haml	in Road
Auburn Hill	ls, MI 48326
United Stat	ces of America
Phone +1-2	248-754-4229

FAX +1-248-754-4207

To: richard.thomas@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com[];

liver.schmidt@vw.com[]

Bcc:

[]
CN=David Good/OU=AA/O=USEPA/C=US From:

Tue 10/16/2012 8:38:05 PM Sent:

Subject: re: 2013 FE Guide - Errors in EPA's data base as of Oct 15, 2012 which held up

posting on www.fueleconomy.gov

VW Group 2013 FEGuide1-all-rel dates-no-sales 10-15-2012.xlsx

Richard,

Attached are the data in Verify as of Oct 15, 2012. Labels with pea green fill in the first few columns were not sent to DOE on Oct 16, 2012 for posting on the web. The next normal posting will be November 1, 2012.

Please make any needed corrections as soon as possible.

Thanks

To: richard.thomas@vw.com[] Cc: Bcc: CN=David Good/OU=AA/O=USEPA/C=US From: Sent: Wed 10/17/2012 4:19:41 PM Subject: Fw: 2013 Printed FE Guide - Did you remove the VW Jetta Hybrid from the Printed Guide? Richard.Thomas@vw.com Oliver.Schmidt@vw.com Leonard.Kata@vw.com Richard.Thomas@VW.com ----- Forwarded by David Good/AA/USEPA/US on 10/17/2012 12:19 PM -----From: "Bain, Debbie T." <baindt@ornl.gov> To: David Good/AA/USEPA/US@EPA "Hopson, Janet L." <hopsonjl@ornl.gov> Cc: Date: 10/17/2012 12:16 PM Subject: RE: 2013 Printed FE Guide - Did you remove the VW Jetta Hybrid from the Printed Guide? Yes, it has been removed. Debbie From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov] Sent: Wednesday, October 17, 2012 11:20 AM To: Bain, Debbie T. Cc: Hopson, Janet L. Subject: 2013 Printed FE Guide - Did you remove the VW Jetta Hybrid from the Printed Guide? Debbie, VW wants to make sure that the 2013 Jetta Hybrid was removed from the Printed Guide. Ex. 4 - CBI Ex. 4 - CBI ----- Forwarded by David Good/AA/USEPA/US on 10/17/2012 11:16 AM -----From: "Thomas, Richard (EEO)" < Richard. Thomas@vw.com> To: David Good/AA/USEPA/US@EPA Cc: "Schmidt, Oliver (EEO)" <Oliver.Schmidt@vw.com>, "Kata, Leonard (EEO)" <Leonard.Kata@vw.com> Date: 10/17/2012 09:23 AM Subject: Published Guide Information

Hi Dave;

Would you be so kind, to confirm that the 2013 fuel economy label, index 100, for the Volkswagen Jetta Hybrid is not included in the published fuel economy guide to be printed sometime in November.

As you also confirmed with our phone conversation, I understand that due to the November release date in Verify, this label index 100 will also not appear on the web fuel economy site either.

Best regards,

Richard E. Thomas VOLKSWAGEN Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO) Phone: 248 754-4213

Fax: 248 754-4207 Richard.Thomas@VW.com

[attachment "winmail.dat" deleted by David Good/AA/USEPA/US]

To: richard.thomas@vw.com[]

Cc: oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA[]

Bcc: []

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Wed 11/21/2012 10:09:16 PM

Subject: re: 2011 CAFE Report

Richard,

re: 2011 CAFE Report

I couldn't find your 2011 CAFE model year report(s) in the Document Module of Verify. I looked in Verify for 2011 model year documents in the Compliance Document Type of "CAFE Model Year Report" and couldn't find any 2011 CAFE reports (the CAFE letter(s) to EPA).

When you get a chance, please email me a pdf copy of your 2011 CAFE report(s) for all applicable categories (Import pass car, Domestic pass car and Light Truck) and enter a copy in the Verify Document module.

**Thanks** 

To: "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]
Co: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]

Bcc: []

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Mon 1/7/2013 2:31:07 PM

Subject: RE: Telephone Message regarding EPA's Verify database requirements for CARB

LEV3 diesel fuel

Len,

Thanks for your email and Happy New Year to you also.

The part of the message that was cut off, I asked two questions, e.g.:

My understanding is that CARB LEV 3 regulations revised the diesel fuel specs for 2015 and subsequent model years---which would require a new fuel code in Verify for CARB LEV3 diesel fuel.

My questions are 1) whether you agree with my reading of CARB LEV3 diesel fuel requirements, and 2) what test fuel VW intends to use for 2014 and later diesel vehicles. [Normally, CARB LEV3 requirements start in 2015 model year, but optionally manufacturers may meet LEV3 requirements in 2014 model year.]

Dave

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>

To: David Good/AA/USEPA/US@EPA

Date: 01/07/2013 08:31 AM Subject: RE: Telephone Message

## Hello Dave:

I heard part of your telephone message regarding diesel fuel, but the system cut it short due to length. My understanding is that you believe that the diesel fuel spec in the ARB LEV III regulations does not comply with the EPA diesel fuel spec. I assume you mean test fuel. You asked if we agree that this is the case, and then the message was cut off. I guess that the rest of the question might be what the implications are for Tier 3 or if we would have some suggestions on how to address this situation. I will discuss this internally and we will respond to the initial question. Please let me know what additional information you may want. A short e-mail would be good, since our telephone message system appears to have some limitations.

Best regard	ds and	Happy	New '	Year.
-------------	--------	-------	-------	-------

Len

Leonard W. Kata Senior Manager Emission Regulations and Certification Engineering and Environmental Office Volkswagen Group of America, Inc. Phone: (248) 754-4204 Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: richard.thomas@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]

Bcc: [

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Tue 1/22/2013 5:21:39 PM

Subject: re: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up

posting on www.fueleconomy.gov

VW Group 2014 FEGuide-all rel dates-no-sales-1-17-2013.xlsx

## Richard,

Our macro picked up a few errors in your 2014 labels. Attached are the data in Verify as of January 17, 2013 for 2014 model year FE labels. Labels with pea green fill in the first few columns contained errors and were not sent to DOE for posting on the web (provided the label release date was Jan 22, 2013 or earlier).

I'll run my next query of the 2014 FE Label data on Feb 1, 2013---for posting on the web a few days later.

Please make any needed corrections when you get a chance.

Thanks

To: richard.thomas@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]

Bcc: [

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Tue 1/29/2013 10:13:41 PM

Subject: re: 2013 FE Guide - Errors in Verify as of 1/27/2013 which need correcting before

2/1/2013 if possible

VW Group 2013 FEGuide new labels-all rel dates-no-sales-1-25-2013.xlsx

VW Group 2014 FEGuide-all rel dates-no-sales-1-25-2013.xlsx

## Richard,

re: 2013 FE Guide - Errors in Verify as of 1/27/2013 which need correcting before 2/1/2013 if possible

Our macro picked up some errors in your 2013 Labels. If possible please correct them before 2/1/2013--- so I can send the data to DOE for posting on the web (for the Feb 1st posting).

Sorry about the late notice. I'll also include the 2014 Labels FYI--they looked OK to me.

Thanks

To: "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]

Cc: CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[];

N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

Bcc: []

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Fri 2/8/2013 5:06:44 PM

Subject: Re: VW/EPA Certification Meeting October 29, 2012

00 Agenda EPA Cert-Test.pptx

01 Start Stop Survey.pptx

02 FFV.pptx

03 AWC.pptx

04 BEV EPA.pptx

05 BEVx 2012 EPA.ppt

06 SAE 1634 EPA.pptx

07 PHEV.pptx

08 Energy assist EPA.pptx

VW EPA Cert Meeting Oct 29,2012.pdf

2014 generic EV Label calculations-1-18-13.xlsm

Len,

Thanks for checking with us (and the reminder). Here are my comments:

1. Item 2 (FFV usage factor) - My notes from that meeting indicate that EPA had quite a few concerns about Item 2---the proposed method of performing a survey of your 2016 and later model year FFVs to determine the in-use ethanol (E85) usage factor, ref. 40 CFR 600.510-12(k). We were concerned about the counting method for your algorithm. It seemed to count any fuel which the ethanol sensor determines is above E20 as if the vehicle were refueled for that refueling event or tankful or those miles(??) as if the vehicle were refueled with E85 (in the spring, summer & fall) or E70-85 (in the winter).

Your minutes seem OK. Your minutes read as follows: "EPA reaction to the VW proposal: 1. May need a more sophisticated algorithm (to account for residual fuel). 2. Need a nationwide rather than regional calculation. VW will present an updated proposal for determination of the usage factor for the next meeting. EPA wants to see more refinement regarding the ethanol content/sensor (Slide 4)."

Please include Rob French and me (for GHG purposes) when you present your updated proposal. Note that EPA intends to provide in the next month or so the 2016 ethanol (E85) usage factor discussed in 40 CFR 600.510-12(k)(1). I think it will be via a Federal Register notice.

2. Item 3 (2017 Audi Q7 PHEV with optional wireless charging system) - I'd like to send a description of this system to NHTSA as soon as possible for their advice on how to classify the vehicle (car or truck) for CAFE purposes. Hopefully EPA and NHTSA will agree on how to classify the vehicle for CAFE and GHG purposes.

Please send us a detailed description of how the ride height of the vehicle is controlled, e.g. how the customer can control ride height, how the vehicle computer controls ride height (including parameters sensed and parameters controlled). In addition, please describe how the optional wireless charging system influences the ride height & ride height controls. For example, please provide a description of the system similar to what will eventually go in the owners manual (plus any other instructions you intend to provide to the customer).

Also, please send us the five measurements for all the various possible ride height positions----including

various driver-controlled ride height positions and and ride height positions which are automatically controlled (similar to your first slide and similar to the information you provided for your 2001 Audi A6 Quattro). Please provide the ride height for vehicles with and without the optional wireless charging system. [Measurements include approach angle, breakover angle, departure angle, running clearance (in inches and cm), axle clearance(in inches and cm).]

- 3. Item 9 Audi Energy Assist and GHG Off-Cycle Credits We had quite a few questions about this system, and couldn't see how to objectively determine the credits. So far, we haven't discussed this item within our GHG team members. To get the issue moving, I'd recommend that you send us a letter outlining the details of how the system works, how you would propose to quantify any potential credits, where in the 2017 GHG rule this system is discussed (if it is), plus any other relevant information.
- 4, BEV PHEV calculators I emailed you the attached BEV calculator a couple weeks ago (the attached spreadsheet is renamed it to 2014). Was this what you were looking for? For the PHEV calculator, I have one for a non-blended PHEV. Do you want a calculator for a non-blended or blended PHEV?

I'll defer to Jim and Chris on the other items in your minutes, plus any additional comments they may have on these two items.

Dave

From: "Kata, Leonard (EEO)" < Leonard. Kata@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA

Date: 02/06/2013 12:00 AM

Subject: VW/EPA Certification Meeting October 29, 2012

Hello Jim, Dave, and Chris:

I know that some time has passed since we met in October 2012, but I would appreciate it if you would take a look at the meeting report and provide any comments or feedback. Other EPA staff participated as well and may wish to contribute their comments.

I have attached all of the slides from our meeting, for ready reference. The report is the last attachment. Please let me know if this should go into VERIFY.

Since the report indicates some follow-up on the part of VW and EPA, we would appreciate an opportunity to have a telephone conference/webinar to discuss the open points.

Best regards,		
Len		
Leonard W. Kata		
Senior Manager		
Emission Regulations and Certification		
Engineering and Environmental Office		

Volkswagen Group of America, Inc.

Phone: (248) 754-4204 Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: richard.thomas@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]

Bcc: [

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Fri 2/8/2013 10:00:15 PM

Subject: re: 2013 FE Guide - Errors in EPA's data base as of February 5, 2013 which held up

posting on www.fueleconomy.gov

VW Group 2013 FEGuide-new labels since 1-3-2013-all rel dates-no-sales-2-5-2013.xlsx

Richard,

re: 2013 FE Guide - Errors in EPA's data base as of February 5, 2013 which held up posting on www.fueleconomy.gov

Attached are the data in Verify as of February 5, 2013 (for new model year 2013 FE labels since January 3, 2012, only). Labels with pea green fill in the first few columns were not sent to DOE on February 5, 2013 for posting on the web. Error messages are in the first column with the column where the error occurred highlighted in yellow fill, as usual.

The next normal posting of 2013 FE Label data will be on March 1, 2013 or so (on a monthly schedule where I run the query on the 1st of the month). If you need an important 2013 FE Label posted on the web before that time, please send me an email message and I'll be glad to have it posted earlier.

Please make any needed corrections when you get a chance.

Thanks

Jim Snyder/AA/USEPA/US@EPA[] To:

Ex. 7 From:

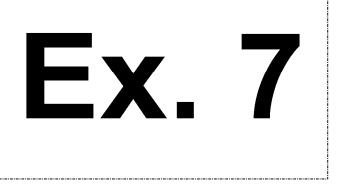
Sent: Fri 3/18/2011 12:17:33 PM

Subject: RE: 2.0L TDI - Volkswagen Requests for Approval

Hi Jim:

Thanks for the quick response.

Best regards,



Volkswagen Group of America, Inc.

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, March 17, 2011 5:10 PM

To: **Ex. 7** 

Subject: Re: 2.0L TDI - Volkswagen Requests for Approval

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:	Ex. 7
То:	Jim Snyder/AA/USEPA/US@EPA, Ex. 7 @arb.ca.gov>
Date:	03/16/2011 03:03 PM
Subject:	2.0L TDI - Volkswagen Requests for Approval

Hello Jim and Ex. 7

Just a heads-up. I have submitted a request for approval of the upward and downward DPF regeneration adjustment factors for the 2012 model year 2.0L TDI test group CVWXV02.0U4S. The request was submitted to EPA and ARB through VERIFY and DMS respectively. These factors are determined as we have done so in the past for our DPF-equipped diesels.

Your attention to this matter would be appreciated. I would also appreciate an update on the status of the review of the SCR/AECD submittal for this test group.

Best regards,



Volkswagen Group of America, Inc.

Ex. 7

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com]

From: "Rodgers, William"

**Sent:** Fri 3/18/2011 6:15:11 PM

Subject: VW Group Supplemental Information VID 411 10208 /12

william.rodgers@vw.com

Hi Jim,

We submitted today the Supplemental Information needed to schedule a test date for the 2012 VW Passat automatic diesel VID 411 10208 /12. Please let me know if you have further questions.

Thanks,

Bill Rodgers

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

To:	Jim Snyder/AA/USE	EPA/US@EPA[]	
Cc:		Ex. 7	
		Ex. 7	
From:	Ex. 7		
Sent:	Mon 3/21/2011 12:4	48:41 PM	
Subject:	VW Group - EPA C	Confirmatory Test Vehicle ID: 411 1	0206 /12
	Ex. 7		

Hello Jim,

We are experiencing delays in getting the following vehicle shipped to the US and would like to request it be temporarily removed from the confirmatory test schedule until we can confirm an arrival date. We will contact you as soon as we know more so a new test date can be scheduled.

Vehicle ID: 411 10206 /12

Vehicle Configuration #: 0

Test Group Name: CVWXV03.6U41

Current test date: 03-28-2011

Best regards,

**Ex.** 7

VOLKSWAGEN Group of America, Inc.



## Ex. 7

To: From:	Jim Snyder/AA/USEPA/US@EPA[] "Giles, Michael"
Sent: Subject:	Tue 3/22/2011 2:25:10 PM RE: Lamborghini Revised Certificate Request - CNLXV06.5L83
Hello Jim,	
	late vehicle information to correct the engine code to L539A, re-submitted the application with SI report, and also requested a new certificate.
the new C	or report, and also requested a new certificate.
l helieve e	verything is ok now, but if you find any other issues please call me.
rachevee	veryaning is ak now, but in you mid any other issues pieuse cuir me.
Thanks	
Mike	
Michael G	iles
Certification	on Specialist
Engineerir	ng and Environmental Office
Volkswage	en Group of America, Inc.
3800 Ham	lin Road
Auburn Hi	lls, MI 48326
United Sta	ites of America
Phone +1-	248-754-4229
FAX +1-24	8-754-4207

 $From: Snyder. Jim@epamail.epa.gov\ [mailto:Snyder. Jim@epamail.epa.gov]\\$ 

Sent: Tuesday, March 22, 2011 8:49 AM

To: Giles, Michael

Subject: Re: Lamborghini Revised Certificate Request - CNLXV06.5L83

Let me know if I need to deny the certificate request fro you to revise it. didn't want to reject it if not needed.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

To:	Jim Snyder/AA/USE	PA/US@EPA[]	
Cc:		Ex. 7	
		Ex. 7	
From:	Ex. 7		
Sent:	Tue 3/22/2011 4:12	.59 PM	
Subject:	RE: VW Group - EP	A Confirmatory Test Vehicle ID: 411 10206	′12
	Ex. 7		

Hi Jim,

As a follow up to my phone message. We are requesting that the below mentioned confirmatory test be rescheduled for May 18, 2011 or during that week if possible.

Regards,

Ex. 7

VOLKSWAGEN Group of America, Inc.

**Ex.** 7

From: Ex. 7

Sent: Monday, March 21, 2011 8:49 AM

To: Snyder, Jim

Cc: Ex. 7

Subject: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Hello Jim,

We are experiencing delays in getting the following vehicle shipped to the US and would like to request it be temporarily removed from the confirmatory test schedule until we can confirm an arrival date. We will contact you as soon as we know more so a new test date can be scheduled.

Vehicle ID: 411 10206 /12

Vehicle Configuration #: 0

Test Group Name: CVWXV03.6U41

Current test date: 03-28-2011

Best regards,

**Ex.** 7

VOLKSWAGEN Group of America, Inc.

**Ex.** 7

1

From:	Jim Snyder/AA/USEPA/US
То:	Ben Haynes/AA/USEPA/US@EPA
Date:	03/22/2011 12:54 PM
Subject	: Fw: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12
	is is the vehicle that is delayed and requested to be pulled from schedule. They'd like it scheduled near the 11 10208 /12.
Complia United (734) 22 snyder.	uty Vehicle Group ance and Innovative Strategies Division States Environmental Protection Agency
From:	Ex. 7
То:	Jim Snyder/AA/USEPA/US@EPA
Cc:	Ex. 7
Date:	03/22/2011 12:14 PM
Subject	: RE: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Hi Jim,

As a follow up to my phone message. We are requesting that the below mentioned confirmatory test be rescheduled for May 18, 2011 or during that week if possible.

Regards,

Ex. 7

VOLKSWAGEN Group of America, Inc.

Ex. 7

From:	Ex. 7	
Sent: M	onday, March 21, 2011 8:49 AM	
To: Sny	er, Jim	
Cc:	Ex. 7	
Subject	VW Group - FPA Confirmatory Test Vehicle ID: 411 10206 /12	

Hello Jim,

We are experiencing delays in getting the following vehicle shipped to the US and would like to request it be temporarily removed from the confirmatory test schedule until we can confirm an arrival date. We will contact you as soon as we know more so a new test date can be scheduled.

Vehicle ID: 411 10206 /12 Vehicle Configuration #: 0

Test Group Name: CVWXV03.6U41 Current test date: 03-28-2011

Best regards,

Ex. 7

VOLKSWAGEN Group of America, Inc.

Ex. 7

To: Jim Snyder/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA[]; rvon

Mitcham/AA/USEPA/US@EPA[]

From: Ex. 7

Ex. 7 Thur 3/24/2011 4:58:17 PM Sent:

Subject: RE: Lamborghini Bench Cycle Request

Hello Jim and Arvon:

I would like to know whether you have an opportunity to review the Lamborghini Bench Cycle request.

Best regards,



Volkswagen Group of America, Inc.



From: Ex. 7

Sent: Wednesday, March 16, 2011 6:10 PM

To: 'Snyder.Jim@epamail.epa.gov'; 'mitcham.arvon@epa.gov'

Subject: Lamborghini Bench Cycle Request

Hello Jim and Arvon:

I wish to inform you that I have submitted, via VERIFY, a request for approval of a Lamborghini Bench Cycle. The cycle would be used for their V12 engine concept. The technical information is provided in the form of a slide presentation. If there are any questions, I can forward these back to Lamborghini. Further, Lamborghini technical staff is available to participate in a telephone conference if there are any detailed questions. I can easily set this up.

There is some urgency associated with the request for approval, so your attention to this matter would be appreciated.

Best regards,

Ex. 7

P.S. Arvon – I assumed that you are still involved in this topic, but if I am not correct, please let me know.

**Ex.** 7

Volkswagen Group of America, Inc.

**Ex.** 7

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William"

Sent: Tue 3/29/2011 12:11:14 PM Subject: VW Group application upload

william.rodgers@vw.com

Hello Jim,

I wanted to clarify that the application and certificate request submitted yesterday for test group CVWXV03.6U41 is related to the upcoming confirmatory test for VID VW411 10206/12 scheduled on May 16th.

Let me know if you have any questions.

Thanks,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com] From: "Giles, Michael" Sent: Tue 3/29/2011 4:12:24 PM Subject: VW Group Decision Info Submitted - running change for addition of Beetle CVWXV02.5259		
Hello Jim,		
Today we submitted Decision Information for a new model:		
Previously certified test group CVWXV02.5259 (Bin 3)		
- New carline: Beetle		
- Automatic transmission		
- Tested in a single configuration as an FEDV		
- A running change to add this model will be forthcoming shortly.		
Please Note: A similar running change for Beetle will be made for the Bin 5 test group CVWXV02.5U35		
Finally, please note that in the future we will add manual transmission versions for this model.		
Please contact me if you have any questions.		
Regards,		
Mike		
Michael Giles		
Certification Specialist		
Engineering and Environmental Office		
Volkswagen Group of America, Inc.		
3800 Hamlin Road		
1		

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael"

**Sent:** Tue 3/29/2011 5:36:03 PM

Subject: RE: VW Group Decision Info Submitted - running change for addition of Beetle

CVWXV02.5259

Hello Jim,

FYI, I just made a correction to this DI submission. There was an unnecessary Cold CO test included in the data set. It was removed with the correction.

- Mike

From: Giles, Michael

Sent: Tuesday, March 29, 2011 12:12 PM

To: Snyder, Jim

Cc: Rodgers, William; Hart, Robert (VWoA)

Subject: VW Group Decision Info Submitted - running change for addition of Beetle CVWXV02.5259

Hello Jim,

Today we submitted Decision Information for a new model:

- Previously certified test group CVWXV02.5259 (Bin 3)
- New carline: Beetle
- Automatic transmission
- Tested in a single configuration as an FEDV
- A running change to add this model will be forthcoming shortly.

Please Note: A similar running change for Beetle will be made for the Bin 5 test group CVWXV02.5U35

Finally, please note that in the future we will add manual transmission versions for this model.

Please contact me if you have any questions		
Regards,		
Mike		
Michael Giles		
Certification Specialist		
Engineering and Environmental Office		
Volkswagen Group of America, Inc.		
3800 Hamlin Road		
Auburn Hills, MI 48326		
United States of America		
Phone +1-248-754-4229		
FAX +1-248-754-4207		

From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" art@vw.com] "Giles, Michael" Fri 4/1/2011 1:12:50 PM		
	Subject: VW Group - Revised application / Running Change CVWXV02.5259		
Hello Jim,			
Yesterday we submitted a revised application and running change for test group CVWXV02.5259. This running change is for the following:			
1) A nar CVWXR012	ne change to replace New Midsized Sedan (NMS) with Passat for evaporative family 25P46		
2) Add r	model Beetle to the test group for evaporative family CVWXR0110237.		
Revised EPA certificates are needed. We submitted new certification requests this morning in Verify.			
Please let me know if you need any other information on your end to proceed.			
Thanks,			
Mike			
Michael Gi			
	on Specialist		
-	g and Environmental Office		
	n Group of America, Inc.		
3800 Haml			
Auburn Hills, MI 48326			
United Sta	tes of America		

Phone +1-248-754-4229

FAX +1-248-754-4207

To: From: Sent:	rom: "Giles, Michael"	
Subject:	FW: VW Group - Revised application / Running Change CVWXV02.5259	
Hello Jim,		
Today we s CADXR011	submitted a new application for test group CADXV02.03PA / Evaporative family 0237.	
Note, this i	s a carryover test group with no new models and dropping the Jetta model for MY2012.	
A request fend.	or certificate was also made in Verify. Please let me know if there are any questions on your	
Regards,		
Mike		
Michael Gi	les	
Certificatio	n Specialist	
Engineerin	g and Environmental Office	
Volkswage	n Group of America, Inc.	
3800 Haml	in Road	
Auburn Hil	ls, MI 48326	
United Sta	tes of America	
Phone +1-2	248-754-4229	
FAX +1-248	3-754-4207	

To: Jim Snyder/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA[]; rvon

Mitcham/AA/USEPA/US@EPA[]

Ex. 7 From:

Wed 4/13/2011 8:20:43 PM Sent:

Subject: RE: Lambo ADP

Hello Jim and Arvon:

(Arvon - I left a telephone message with you a earlier today.)

I would appreciate an update on the status of the Lamborghini Bench Test request for approval. This topic has become somewhat urgent.

Best regards,



Volkswagen Group of America, Inc.

From: Ex. 7

Sent: Friday, April 01, 2011 8:30 AM

To: 'Snyder.Jim@epamail.epa.gov'		
Subject: RE: Lambo ADP		
Hi Jim:		

Great. Thanks for the follow-up.



From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

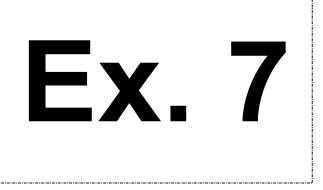
Sent: Thursday, March 31, 2011 5:22 PM

To: Ex. 7
Subject: Lambo ADP

I talked to Arvon about the Lambo ADP. He seemed agreeable to it so you may hear from him soon.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

Mitcham/AA/USEPA/US@EPA[]  Cc: Ex. 7  From: Sent: Thur 4/14/2011 2:43:31 PM  Subject: RE: Lambo ADP  mailto:Snyder.Jim@epamail.epa.gov		
Hello Jim and Arvon:		
I am available between 11 AM and 3 PM today. Do you have specific questions regarding he Lamborghini submission? If so I can try to tie in the Lamborghini folks. You may recall that they volunteered to have a conference call.		
Regarding the durability procedures used for MY 2011 and 2012, there are charts in Section 4 of the Common Section that identify the durability procedure used for each test group. For these model years, the general breakdown is essentially the same and is described below:		
1. The majority of the test groups use the Volkswagen Alternate Durability Procedure (VWADP), which is a whole-vehicle, accelerated durability procedure that has been used for a number of years.		
2. The Diesel test groups (2.0L TDI and 3.0L TDI), use the Standard Road Cycle.		
3. EPA assigned DFs are use for three limited production concepts; namely the Bentley 63/4L Mulsanne, the Lamborghini V-12 Aventador, and the Bugatti.		
Lamborghini is requesting approval of a bench cycle for use with a forthcoming 2012 test group.		
At one point, we presented a Volkswagen Bench Cycle; however, this procedure is not used at the moment. There is a reference to this procedure in the Lamborghini Bench Cycle request, for comparison purposes. In addition, we have presented a Bench Cycle for diesels, but again, we are not there yet.		
If you would like a list summarizing the application of the procedures, please let me know.		
Best regards,		



Volkswagen Group of America, Inc.



From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, April 13, 2011 5:38 PM

To: **Ex. 7** 

Cc: Mitcham.Arvon@epamail.epa.gov

Subject: RE: Lambo ADP

Ex. 7 are you available for a short phone conference tomorrow sometime between 9:30 and 1:00?

We have some questions on which vehicles are using vehicle aging, VW bench aging, and Lambo bench aging for 2011 and 2012. do you have a table or chart like that?

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

Ex. 7

To:

Jim Snyder/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA

Date:

04/13/2011 04:21 PM

Subject:

RE: Lambo ADP

Hello Jim and Arvon:

(Arvon – I left a telephone message with you a earlier today.)

I would appreciate an update on the status of the Lamborghini Bench Test request for approval. This topic has become somewhat urgent.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

From: Ex. 7

Sent: Friday, April 01, 2011 8:30 AM To: 'Snyder.Jim@epamail.epa.gov'

Subject: RE: Lambo ADP

Hi Jim:

Great. Thanks for the follow-up.

### Ex. 7

 $From: Snyder. Jim@epamail.epa.gov\ [mailto:Snyder. Jim@epamail.epa.gov]\\$ 

Sent: Thursday, March 31, 2011 5:22 PM

To: Ex. 7
Subject: Lambo ADP

I talked to Arvon about the Lambo ADP. He seemed agreeable to it so you may hear from him soon.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

To:	Jim Snyder/AA/USEPA/US@EPA[]	
Cc:	Arvon Mitcham/AA/USEPA/US@EPA	Ex. 7
[		

From: Ex. 7

**Sent:** Thur 4/14/2011 4:02:54 PM

Subject: RE: Lambo ADP

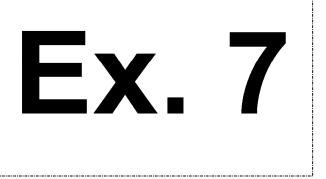
mailto:Snyder.Jim@epamail.epa.gov mailto:Snyder.Jim@epamail.epa.gov

Hello Jim and Arvon:

Much appreciated!

I have told Lambo the good news.

Best regards,



Volkswagen Group of America, Inc.

**Ex.** 7

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]	
Sent: Thursday, April 14, 2011 11:37 AM To: Ex. 7	
Cc: Mitcham.Arvon@epamail.epa.gov; Ex. 7	
Subject: RE: Lambo ADP	
Thanks for the note clarifying the various methods used. Arvon and I discussed it and agreed that you are on the will send VW and Lamborghini a formal letter of approval but you can submit cert requests before then	-
lim Snyder Light-Duty Vehicle Group	
Compliance and Innovative Strategies Division	
United States Environmental Protection Agency	
(734) 214-4946	
snyder.jim@epa.gov	
From:	
Ex. 7	
то:	
Jim Snyder/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA	
Cc:	
Ex. 7	
Date:	
04/14/2011 10:44 AM	
Subject:	
RE: Lambo ADP	

Hello Jim and Arvon:

I am available between 11 AM and 3 PM today. Do you have specific questions regarding he Lamborghini submission? If so I can try to tie in the Lamborghini folks. You may recall that they volunteered to have a conference call.

Regarding the durability procedures used for MY 2011 and 2012, there are charts in Section 4 of the Common Section that identify the durability procedure used for each test group. For these model years, the general

breakdown is essentially the same and is described below:

- The majority of the test groups use the Volkswagen Alternate Durability Procedure (VWADP), which is a whole-vehicle, accelerated durability procedure that has been used for a number of years.
- The Diesel test groups (2.0L TDI and 3.0L TDI), use the Standard Road Cycle.
- EPA assigned DFs are use for three limited production concepts; namely the Bentley 63/4L Mulsanne, the Lamborghini V-12 Aventador, and the Bugatti.

Lamborghini is requesting approval of a bench cycle for use with a forthcoming 2012 test group.

At one point, we presented a Volkswagen Bench Cycle; however, this procedure is not used at the moment. There is a reference to this procedure in the Lamborghini Bench Cycle request, for comparison purposes. In addition, we have presented a Bench Cycle for diesels, but again, we are not there yet.

If you would like a list summarizing the application of the procedures, please let me know.

Best regards,

Volkswagen Group of America, Inc.

**Ex.** 7

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, April 13, 2011 5:38 PM

To: **Ex. 7** 

Cc: Mitcham.Arvon@epamail.epa.gov

Subject: RE: Lambo ADP

Len, are you available for a short phone conference tomorrow sometime between 9:30 and 1:00?

We have some questions on which vehicles are using vehicle aging, VW bench aging, and Lambo bench aging for 2011 and 2012. do you have a table or chart like that?

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

Ex. 7

To:

Jim Snyder/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA

Date:

04/13/2011 04:21 PM

Subject:

RE: Lambo ADP

Hello Jim and Arvon:

(Arvon – Heft a telephone message with you a earlier today.)

I would appreciate an update on the status of the Lamborghini Bench Test request for approval. This topic has become somewhat urgent.

Best regards,

**Ex.** 7

Volkswagen Group of America, Inc.

Ex. 7

From: Ex. 7

Sent: Friday, April 01, 2011 8:30 AM To: 'Snyder.Jim@epamail.epa.gov'

Subject: RE: Lambo ADP

Hi Jim:

Great. Thanks for the follow-up.

Ex. 7

4

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, March 31, 2011 5:22 PM

To: Ex. 7
Subject: Lambo ADP

I talked to Arvon about the Lambo ADP. He seemed agreeable to it so you may hear from him soon.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

To: Cc: [Robert.Ha From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" art@vw.com] "Giles, Michael" Fri 4/15/2011 6:23:30 PM VW Group - Certificate Request for new diesel test group CVWXV02.0U4S
Subject.	vvv Gloup - Certificate Request for New dieser test group Cvvvxv02.0043
Hello Jim,	
	submitted application documents and a certificate request for the new diesel test group 0U4S (Passat).
	re requesting a conditional certificate for this test group. A confirmatory test for this vehicle is $^{\sim}$ May 18th.
Please let r	myself or Bill Rodgers know if there are any issues with this moving forward.
Best Regar	ds,
Mike	
Michael Gi	les
Certificatio	n Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hil	ls, MI 48326
United Stat	tes of America
Phone +1-2	248-754-4229

FAX +1-248-754-4207

Cc: "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com]

From: "Rodgers, William"

**Sent:** Tue 4/19/2011 3:46:09 PM

**Subject:** VW Group Decision Information - CADXV02.53UK

william.rodgers@vw.com

Hi Jim,

I submitted tests and decision information for the new 2012 Audi test group CADXV02.53UK. This is for a performance variant of the Audi TT with 360 horsepower. There is no new technology involved, however, it represents the first combination of exist (VW) 5-cylinder in-line engine with all-wheel drive and direct injection turbocharging (TFSI). Let me know if you have any questions.

Regards,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o) To: richard.thomas@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Ted

Trimble/OU=AA/O=USEPA/C=US@EPA[]; N=Ted Trimble/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Wed 4/20/2011 2:32:15 PM

Subject: Fw: New 2010 ABT template attached

ABT Report Template 1 5 2011.xlsx

(embedded image)

#### Richard,

Here's the new AB&T template---although Mitsubishi found an error in the new template . As we discussed today, detailed fleet average calculations (using the template) are not needed if all of the manufacturer's vehicles are certified at or below the fleet average NOx standard----and the mfr doesn't want to bank credits, etc. See 86.1860-04(c)(2) and 86.1862-04(b)(2).

Ted Trimble is the EPA lead on AB&T issues----so please work with him if the template needs corrections.

Mitsubishi found the following error in the new template: "In the "current MY credit calculation" tab, when we enter "150k" useful life in column F, and "NO" in column G, we still get a incorrect value of 0.85 in column L. The correct value in column L should be 1. Any advise or fix?"

There may be other errors. I'm not sure if any manufacturers have sent their AB&T calculations to EPA using the revised template or not---Ted might know.

#### Regards

---- Forwarded by David Good/AA/USEPA/US on 04/20/2011 09:52 AM -----

From: Ted Trimble/AA/USEPA/US
To: OAR-OTAQ-CISD-LDVG
Date: 04/18/2011 03:41 PM

Subject: ABT template

For 2010 and beyond, Mary's group has reworked the template for recording ABT reports. The old template did not accept a letter as the first character in the engine family, the new one does.

Ted Trimble, Mechanical Engineer CCD, USEPA 734 214 4289

To: From:		
Sent:	<b>Sent:</b> Wed 4/20/2011 8:04:15 PM	
	VW Group - Decision Infomration sent VW Beetle tent.usatoday.com/communities/driveon/post/2011/04/2012-vw-beetle-global-us-bigger-	
/1?csp=3/ william.ro	4 dgers@vw.com	
Hello Jim,		
As a follow up to the message below, I just submitted the Decision Information for fuel economy tests for the 2012 Beetle (BIN 5/ULEV, automatic) for test group CADXJ02.03UA.		
Thanks,		
Mike		
Michael G	iles	
Certification	on Specialist	
Engineerin	g and Environmental Office	
Volkswage	en Group of America, Inc.	
3800 Ham	lin Road	
Auburn Hi	lls, MI 48326	
United Sta	tes of America	
Phone +1-	248-754-4229	
FAX +1-24	8-754-4207	

From: Rodgers, William

Sent: Wednesday, April 20, 2011 12:47 PM

To: Snyder, Jim Cc: Giles, Michael Subject: VW Beetle
Hi Jim,
Thought you might like to see the next generation 2012 Beetle below. I just submitted a decision information for the turbo version in test group CVWXV02.03PA (Bin 3/SULEV). As a heads up, Mike Giles will be submitting the corresponding Bin 5/ULEV tests soon.
http://content.usatoday.com/communities/driveon/post/2011/04/2012-vw-beetle-global-us-bigger-/1?csp=34
Bill Rodgers
Engineering and Environmental Office
VOLKSWAGEN Group of America, Inc. Rochester Hills, MI
United States
(248) 754-4219
(248) 754-4207
william.rodgers@vw.com
/_\. (o\_I_/o)

To: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;richard.thomas@vw.com[];

ichard.thomas@vw.com[]

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William"

[William.Rodgers@vw.com]

From: CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Fri 4/22/2011 6:52:24 PM

Subject: Re: CADXT03.23UC fee payment

I forwarded it to Richard. Bill did receive an Audi payment but it didn't have the full group name on it and no fee form.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US

To: "Rodgers, William" < William.Rodgers@vw.com>
Cc: "Hart, Robert (VWoA)" < Robert.Hart@vw.com>

Date: 04/22/2011 02:42 PM Subject: CADXT03.23UC fee payment

No record of receiving payment yet. I couldn't find a copy of the Fee payment form in the Part 1 either. I can't go to Bill without the payment form. Was it paid very recently?

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov To: Jim Snyder/AA/USEPA/US@EPA[]
From: "Hart, Robert (VWoA)"
Sent: Fri 4/22/2011 6:54:40 PM
Subject: RE: CADXT03.23UC fee payment
CertFee CADXT03.23UC.pdf

Hello Jim,

I have attached the fee filing form for this test group. I will have Bill Rodgers (he's not in today) upload a revised application with the form included on Monday.

The form was submitted on 7-Apr-11. The money transfers are done on Thursdays and that was three Thursdays ago.

I'll have to make sure my replacements are using an application checklist to make sure they get it right the first time.

Sorry for the confusion.

**Bob Hart** 

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Friday, April 22, 2011 2:43 PM

To: Rodgers, William Cc: Hart, Robert (VWoA)

Subject: CADXT03.23UC fee payment

No record of receiving payment yet. I couldn't find a copy of the Fee payment form in the Part 1 either. I can't go to Bill without the payment form. Was it paid very recently?

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

### U.S. ENVIRONMENTAL PROTECTION AGENCY MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM

O EDA	FEE FILING FORM	
FOR CERTIFICATION APPLICATION	ONS RECEIVED IN CALENDAR YEAR 2011	
Manufacturer Name VOLKSWAGEN Group of Amer	ica, Inc.	
Address 3800 Hamlin Roa	d	
City/State/Zip Code/Country Auburn Hills, MI 48	309	
On-Highway Certificat	ion Request Type (check one)	
X LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL	(\$33,974)	
LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY	(\$17,255)	
HDE (Engine Dyno cert) FEDERAL (\$34,452)	☐ MOTORCYCLE (\$1,210)	
	LD/MDPV/HDV ICI (\$55,252)	
EPA standard engine family or test group or HDV Evaporative family name:	C A D X T 0 3 . 2 3 U C	
Amount paid (U.S. Funds Only):	\$ 33,974.00	
Enter the check number, or the statement "EFT/W	IRE" or "EFT/ACH": EFT	
Aggregate retail sales price of the vehicles/en Check box if an Independent Commercial Importer	:    List the VIN of imported vehicles/engines below:	
	ne ff.	
Company Representative: Richard E. Thomas	Signature: K Mms	
Title: Emission Cert Strategist Phone/Fax: 248 7	754 4213 / 248 754 4207 Date: 4 /7 / 2011	
E-mail Address: Richard.Thomas@VW.com  Submission of payments and forms:  (1) Online: Forms may be found and submitted with or without payments online at <a href="www.Pay.gov">www.Pay.gov</a> .  (2) Send checks and this form to:		
Environmental Protection Agency Motor Vehicle and Engine Compliance Program P.O. Box 979032 St. Louis, MO 63197-9000		
(3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2) (4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2) (5) Forms not submitted under (1) and (2) above can be sent as email attachments to Fees@epa.gov. Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).		
The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.		
	This form expires: 1/1/2012	

To: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]
Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]
From: CN=Willem VandenBroek/OU=AA/O=USEPA/C=US

**Sent:** Mon 4/25/2011 11:11:33 AM

Subject: Re: Fw: CADXT03.23UC fee payment

Notwithstanding, EPA had not received this form on April 7 or any other date.

EPA has one unobligated ACH payment from Volkswagen, processed on April 15, for  $$135,896 = 4 \times $33,974 \text{ LDV}$  certification fees. I will take this family out of that payment. We have not received forms indicating Volkswagen's intentions for the remainder of this payment.

Bill Vanden Broek MVECP Fees 734-214-4468

From: Jim Snyder/AA/USEPA/US

To: Willem VandenBroek/AA/USEPA/US@EPA
Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>

Date: 04/22/2011 03:11 PM

Subject: Fw: CADXT03.23UC fee payment

Thanks Bob.

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov
----- Forwarded by Jim Snyder/AA/USEPA/US on 04/22/2011 03:10 PM -----

From: "Hart, Robert (VWoA)" < Robert.Hart@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 04/22/2011 02:54 PM

Subject: RE: CADXT03.23UC fee payment

Hello Jim,

I have attached the fee filing form for this test group. I will have Bill Rodgers (he's not in today) upload a revised application with the form included on Monday.

The form was submitted on 7-Apr-11. The money transfers are done on Thursdays and that was three Thursdays ago.

I'll have to make sure my replacements are using an application checklist to make sure they get it right the first time.

Sorry for the confusion.

#### **Bob Hart**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Friday, April 22, 2011 2:43 PM

To: Rodgers, William Cc: Hart, Robert (VWoA)

Subject: CADXT03.23UC fee payment

No record of receiving payment yet. I couldn't find a copy of the Fee payment form in the Part 1 either. I can't go to Bill without the payment form. Was it paid very recently?

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov[attachment "CertFee\_CADXT03.23UC.pdf" deleted by Willem VandenBroek/AA/USEPA/US]

To: Fees@EPA[]

Cc: Willem VandenBroek/AA/USEPA/US@EPA;Jim

Snyder/AA/USEPA/US@EPA;"Rodgers, William" [William.Rodgers@vw.com]; im

Snyder/AA/USEPA/US@EPA;"Rodgers, William" [William.Rodgers@ww.com]; Rodgers, William"

[William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]

From: "Thomas, Richard (EEO)"
Sent: Mon 4/25/2011 11:12:21 AM

Subject: 3 Audi - One Volkswagen Certification Fee Filing Forms

2012 three Audi TG Cert Fee Filing forms to EPA.pdf 2012 EPA Cert Fees CVWXV02.0U5N to EPA.pdf Richard.Thomas@VW.com

Please find attached the certification fee filing forms for three Audi test groups, and one Volkswagen test group. These fees were processed/paid, on the Volkswagen end, on April 15, 2011.

If there are any questions please contact me directly.

Best regards,

Richard E. Thomas VOLKSWAGEN Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO)

Phone: 248 754-4213 Fax: 248 754-4207

Richard.Thomas@VW.com

# U.S. ENVIRONMENTAL PROTECTION AGENCY

<b>⊕EPA</b>	MOTOR VEHICLE AND ENGINE COM ON-HIGHWAY FEE FILI	
	FOR CERTIFICATION APPLICATIONS RECEIV	
Manufacturer N	Jame VOLKSWAGEN Group of America, Inc.	·
Address		
	Code/Country Auburn Hills, MI 48309	
	On-Highway Certification Request	Type (check one)
▼ LDV/LDT/t	MDPV/HDV (Chassis cert) FEDERAL (\$33,974)	HDV EVAP-ONLY (\$511)
LDV/LDT/	MDPV/HDV (Chassis cert) CAL-ONLY (\$17,255)	HDE CALIF-ONLY (\$511)
HDE (Eng:	ine Dyno cert) FEDERAL (\$34,452)	MOTORCYCLE (\$1,210)
· · · · · · · · · · · · · · · · · · ·		LD/MDPV/HDV ICI (\$55,252)
EPA standard en	gine family or test group or family name:	C A D X T 0 3 . 2 3 U C
Amount paid (U.	S. Funds Only):	\$ 33,974.00
Enter the check	number, or the statement "EFT/WIRE" or "EF	T/ACH": EFT
	Independent Commercial Importer. [] Hist	the VIN of imported vehicles/engines below:
	der lieb varieties de la constant de	<b>Ex.</b> 6
	ntative: Richard E. Thomas	Signature:
Title: Emission C	Cert Strategist Phone/Fax: 248 754 4213	/ 248 754 4207 Date: 4 /7 / 2011
(1) Online: For	Richard.Thomas@VW.com  ayments and forms: ms may be found and submitted with or with and this form to:	out payments online at www.Pay.gov.
	Environmental Protection  Motor Vehicle and Engine Comp P.O. Box 97903 St. Louis, MO 63197	pliance Program 2
<ul><li>(4) Transmit of:</li><li>(5) Forms not so</li><li>Forms and payment</li></ul>		be delayed or ineffective. See the
on EPA's need for this including through the u	nd recordkeeping burden for this collection of information is established information, the accuracy of the provided burden estimate, and use of automated collection techniques, to the Director, Collection vivania Ave., N.W., Washington, D.C. 20460. Include the OM-29 to this address.	d any suggested methods for minimizing respondent burden, in Strategies Division, U.S. Environmental Protection Agency
		This form expires: 1/1/2012

### U.S. ENVIRONMENTAL PROTECTION AGENCY MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM ON-HIGHWAY FEE FILING FORM

SEPA ON-HIGHWAY FEE FILING FORM	
FOR CERTIFICATION APPLICATIONS RECEIVED IN CALENDAR YEAR 2011	
Manufacturer Name VOLKSWAGEN Group of America, Inc.	
Address 3800 Hamlin Road	
City/State/Zip Code/Country Auburn Hills, MI 48309	
On-Highway Certification Request Type (check one)	New Assessment Week Column has been been been been been been been bee
☑ LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$33,974) ☐ HDV EVAP-ONLY (\$511)	
LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,255) HDE CALIF-ONLY (\$511)	
HDE (Engine Dyno cert) FEDERAL (\$34,452) MOTORCYCLE (\$1,210)	
EPA standard engine family or test group or HDV Evaporative family name:	6 5
Amount paid (U.S. Funds Only): \$ 33,974.00	
Enter the check number, or the statement "EFT/WIRE" or "EFT/ACH":	
Aggregate retail sales price of the vehicles/engines: \$ x 1% = \$ Check box if an Independent Commercial Importer: List the VIN of imported vehicles/engines	s below:
Company Representative:	***************************************
Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 7 / 201	11
E-mail Address: Richard.Thomas@VW.com  Submission of payments and forms: (1) Online: Forms may be found and submitted with or without payments online at <a href="https://www.Pay.gov">www.Pay.gov</a> . (2) Send checks and this form to:	
Environmental Protection Agency Motor Vehicle and Engine Compliance Program P.O. Box 979032 St. Louis, MO 63197-9000	
(3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instruction (4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (Instructions (5) Forms not submitted under (1) and (2) above can be sent as email attachments to Fees@epa Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).	s, p.2)
The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send come on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent be including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection A (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not see completed Form 3520-29 to this address.	ourden, Agency
This form expires: 1/1/2012	J

## U.S. ENVIRONMENTAL PROTECTION AGENCY

<b>⊗EPA</b>	MOTOR VEHICLE AND ENGINE COMON-HIGHWAY FEE FILI	
	FOR CERTIFICATION APPLICATIONS RECEIVE	ED IN CALENDAR YEAR 2011
Manufacture	r Name VOLKSWAGEN Group of America, Inc.	
Address	3800 Hamlin Road	
City/State/	Zip Code/Country Auburn Hills, MI 48309	
maniidakiikhahahahiin jirqqahahil qoo oo	On-Highway Certification Request	Type (check one)
⊠ LDV/LI	OT/MDPV/HDV (Chassis cert) FEDERAL (\$33,974)	HDV EVAP-ONLY (\$511)
☐ rpa\ri	OT/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,255)	HDE CALIF-ONLY (\$511)
☐ HDE (E	Engine Dyno cert) FEDERAL (\$34,452)	☐ MOTORCYCLE (\$1,210)
		LD/MDPV/HDV ICI (\$55,252)
1	engine family or test group or ive family name:	C A D X V 0 4 . 2 3 7 5
Amount paid	(U.S. Funds Only):	\$ 33,974.00
Enter the che	eck number, or the statement "EFT/WIRE" or "EF	r/ACH": EFT
	ail sales price of the vehicles/engines: \$ an Independent Commercial Importer: [] List to	
		Ex. 6
	esentative: Richard E. Thomas	Mark to the first
Title: Emission	on Cert Strategist Phone/Fax: 248 754 4213	/248 754 4207 Date: 4 /7 / 2011
(1) Online: E	Richard.Thomas@VW.com  f payments and forms:  Forms may be found and submitted with or with ocks and this form to:	out payments online at www.Pay.gov.
	Environmental Protection  Motor Vehicle and Engine Comp P.O. Box 97903  St. Louis, MO 63197	oliance Program 2
<pre>(4) Transmit (5) Forms not Forms and pay</pre>	offline EFT/Wire payments to the New York Fe offline EFT/ACH payments to the Federal Reset submitted under (1) and (2) above can be segments sent in ways other than the above may for sending checks and forms by private mail	rve Bank of Cleveland. (Instructions, p.2) nt as email attachments to Fees@epa.gov. be delayed or ineffective. See the
on EPA's need for including through (2822T), 1200 Pe	ng and recordkeeping burden for this collection of information is est rethis information, the accuracy of the provided burden estimate, and the use of automated collection techniques, to the Director, Collection nnsylvania Ave., N.W., Washington, D.C. 20460. Include the OM 520-29 to this address.	l any suggested methods for minimizing respondent burden, n Strategies Division, U.S. Environmental Protection Agency
		This form expires: 1/1/2012

# U.S. ENVIRONMENTAL PROTECTION AGENCY

<b>⊗EPA</b>	MOTOR VEHICLE AND ENGINE CON- ON-HIGHWAY FEE FILI	
<b>J</b>	FOR CERTIFICATION APPLICATIONS RECEIV	
Manufacturer N	Name VOLKSWAGEN Group of America, Inc.	
Address		
	p Code/Country Auburn Hills, MI 48309	
	On-Highway Certification Reques	t Type (check one)
▼ LDV/LDT/	MDPV/HDV (Chassis cert) FEDERAL (\$33,974)	☐ HDV EVAP-ONLY (\$511)
LDV/LDT/	MDPV/HDV (Chassis cert) CAL-ONLY (\$17,255)	HDE CALIF-ONLY (\$511)
☐ HDE (Eng	rine Dyno cert) FEDERAL (\$34,452)	MOTORCYCLE (\$1,210)
		☐ LD/MDPV/HDV ICI (\$55,252)
EPA standard en HDV Evaporative	agine family or test group or e family name:	C V W X V 0 2 . 0 U 5 N
Amount paid (U.	S. Funds Only):	\$ 33,974.00
Enter the check	number, or the statement "EFT/WIRE" or "EF	T/ACH": EFT
Check box if an	Independent Commercial Importer: List	the VIN of imported vehicles/engines below:
	Richard F. Thomas	<b>Ex.</b> 6
	Cert Strategist Phone/Fax: 248 754 4213	
	Dish and Theorem CN 0M and	Date: // / 2011
(1) Online: For	cayments and forms: cms may be found and submitted with or with c and this form to:	nout payments online at www.Pay.gov.
	Environmental Protection Motor Vehicle and Engine Com P.O. Box 97903 St. Louis, MO 63197	pliance Program 32
<pre>(4) Transmit of (5) Forms not s Forms and payme</pre>		be delayed or ineffective. See the
on EPA's need for thi	and recordkeeping burden for this collection of information is es is information, the accuracy of the provided burden estimate, an use of automated collection techniques, to the Director, Collecticylvania Ave., N.W., Washington, D.C. 20460. Include the ON 0-29 to this address.	d any suggested methods for minimizing respondent burden, on Strategies Division, U.S. Environmental Protection Agency
<del>``````````````````````````</del>		This form expires: 1/1/2012

EPA FOIA Production 2016-09-01

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael"

[michael.giles@vw.com]

From: "Rodgers, William"

**Sent:** Wed 4/27/2011 3:24:53 PM

**Subject:** VW Group - VID: C3UK-AMQ Decision/Supplemental information

william.rodgers@vw.com

Hello Jim,

I submitted a correction to the Decision Information input for Audi test group: CADXV02.53UK, VID: C3UK-AMQ, requesting that the vehicle be delivered to EPA on May 23rd and hopefully tested on May 25th to coincide with the already scheduled Audi Q7 tests that week.

In addition, I submitted the Supplemental Information for this vehicle with Shift Schedule ID's for filleronly purposes, as noted in the comments section. The correct (new) Manual 6-speed shift schedules are being preparing and will be uploaded in the near future, prior to the test date.

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

From: "Rodgers, William"

**Sent:** Wed 4/27/2011 5:39:52 PM **Subject:** VW Group - Test Question

image001.gif

Hi Jim,

Is the diesel US06 testing to be performed on this vehicle intended to be both (test type 90) one bag tests for particulate measurement, or did you mean one test to be a (test type 89) two bag?

Thanks,

Bill

From:

Verify Administrator

Subject:

Vehicle selected for Test B3UG-TAQ, Supplemental Information needed

Date:

Fri 4/22/2011 1:52 PM

Your recent submission has been selected by the EPA for Confirmatory Testing for the following vehicle: Manufacturer: ADX Vehicle ID: B3UG-TAQ Vehicle Configuration: 0 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 90 - US06 19 - Cert Diesel 7-15 ppm Sulfur 2 - CVS 75 and later (w/o can. load) 19 - Cert Diesel 7-15 ppm Sulfur 3 - HWFE 19 - Cert Diesel 7-15 ppm Sulfur

Vehicle ID: B3UG-TAQ

Vehicle Configuration #: 0

Test Group Name: CADXT03.03UG

From: "Rodgers, William"

Sent: Thur 4/28/2011 11:57:40 AM Subject: RE: VW Group - Test Question

image001.gif

Thanks Jim.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, April 27, 2011 4:26 PM

To: Rodgers, William

Subject: Re: VW Group - Test Question

I scheduled both a 2bag and a 1bag US06. On my side of Verify, they are both shown as code 90 but one will change to 89 in the lab's system.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Rodgers, William" < William.Rodgers@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

04/27/2011 01:39 PM

Subject:

VW Group - Test Question

Hi Jim,

Is the diesel US06 testing to be performed on this vehicle intended to be both (test type 90) one bag tests

for parti Thanks, Bill	iculate measurement, or did you mean one test to be a (test type 89) two bag?
From:	Verify Administrator
Subjec	t: Vehicle selected for Test B3UG-TAQ, Supplemental Information needed
Date:	Fri 4/22/2011 1:52 PM

Your recent submission has been selected by the EPA for Confirmatory Testing for the following vehicle: Manufacturer: ADX Vehicle ID: B3UG-TAQ Vehicle Configuration: 0 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 90 - US06 19 - Cert Diesel 7-15 ppm Sulfur 2 - CVS 75 and later (w/o can. load) 19 - Cert Diesel 7-15 ppm Sulfur 90 - US06 19 - Cert Diesel 7-15 ppm Sulfur 3 - HWFE 19 - Cert Diesel 7-15 ppm Sulfur

Vehicle ID: B3UG-TAQ Vehicle Configuration #: 0

Test Group Name: CADXT03.03UG

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com] From: "Rodgers, William" Sent: Fri 4/29/2011 1:21:50 PM Subject: VW Group - Certification Requests for ADX\_2UG and ADX\_3UG william.rodgers@vw.com Hi Jim, I have uploaded Initial applications and certification requests for the following test groups for your review and approval: CADXT03.02UG – VW Touareg TDI (LDT3) This is a carryover from 2011 model year with no changes. VW group has agreed to pay penalties for two of the four OBD deficiencies described in the OBD approval letter found in the application. CADXT03.03UG - Audi Q7 TDI (LDT4) This is a carryover test group with new tests for 2012. VW group has agreed to pay penalties for two of the four OBD deficiencies described in the OBD approval letter found in the application. A conditional certificate is requested pending EPA confirmatory testing scheduled for the related VID B3UG-TAQ. Thanks,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

To: richard.thomas@vw.com[]

Cc: christoph.kohnen@vw.com;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[];

N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Fri 4/29/2011 9:41:27 PM

Subject: re: 2012 FE Guide data for web posting on May 23, 2011 - Please review & let EPA

know after the Verify data is error free and ready for posting on www.fueleconomy.gov

VW-2012 FE Guide.zip

Richard,

Attached are Excel Spreadsheets for each manufacturer which you are handling.

The spreadsheet(s) are encrypted & password protected. I'll call you with the password---or you can call me at 734-214-4450 to get the password.

The spreadsheet(s) contain all the 2012 FE label data from EPA's Verify data base as of April 26, 2011. Please review the attached data for errors (including my comments in the first column) and make the appropriate corrections in Verify. Please double check any new FE Labels which you input into Verify (not listed in this spreadsheet) to make sure they are error free. Any corrections should be made directly in the EPA Verify database. [Do not correct the spreadsheet and send it back.] I am forwarding the schedule for the May, 2011 release and some "reminders" for your convenience.

The models highlighted in green fill (if any) contain errors and will not be sent to DOE for web posting unless the errors are corrected.

The last date to make changes for the web posting is May 11, 2011. EPA will review the data on May 12 and forward it to DOE on (or before) May 18 for posting on the web on May 23, 2011.

Please let me know when you have made all corrections, entered any new labels into Verify and everything is "good to go."

Thanks

---- Forwarded by David Good/AA/USEPA/US on 04/29/2011 04:53 PM ----

From: David Good/AA/USEPA/US

To: Auto Manufacturer FE Label personnel

Cc:

Date: 04/26/2011 01:55 PM

Subject: Fw: 2012 FE Guide - Schedule for May, 2011 web release on www.fueleconomy.gov [Revised

schedule attached]

To manufacturers,

I revised the implementation schedule slightly for the May 2011 release of the 2012 FE Guide on www.fueleconomy.gov.

Since EPA's contractor will be deploying Verify Release 3 changes on May 13, 2011, the revised schedule will make it easier for manufacturers to enter data and make corrections to Verify. It will also make it easier for EPA review the 2012 FE Guide data in Verify. The new schedule makes the following changes:

The last day for manufacturers to make corrections will now by May 11 (instead of May 16); EPA will perform the FE Guide Verify query (for EPA review) on May 12 (instead of May 17).

## The revised schedule is as follows:

Date Action

Apr 26 (Tues) EPA Verify staff performs 2012 FE Guide Verify query (separated by mfr, etc) for EPA review Apr 27 (Wed) EPA sends FE Guide data to manufacturers for review & corrections; also sends prelim data to

DOE

Apr 28-May 11 Mfrs review & make corrections

May 11 (Wed) Last day for manufacturers to make corrections and add new data May 12 (Thur) EPA Verify staff performs 2012 FE Guide Verify query for EPA review

May 18 (Wed) EPA sends final data to DOE

May 23 (Mon) DOE publishes 2012 FE Guide data on web

If you have any questions, feel free to give your team member or me a call or send us an email message. I'm at 734-214-4450.

## Regards

## Reminders:

FE Labels with errors won't be posted on the web: FE Labels with errors (which are not corrected in EPA's Verify data base by May 11, 2011) will not be sent to DOE for posting on www.fueleconomy.gov. For example, FE Labels will not be sent to DOE for posting on www.fueleconomy.gov. if they contain errors in the unadjusted combined fuel economy value; errors in the adjusted city, highway or combined fuel economy value; missing interior volume/cargo volume information (required for passenger cars only--except not required for 2-seater vehicles); duplicate entries, etc.

Release date for 2011 Labels: Please be sure that the release date is correct in EPA's Verify data base. For the May release, we will post FE Labels on the web which have a release date of May 23, 2011 and earlier.

2WD SUV Classification: As outlined on page 6 of EPA guidance letter CISD-10-14, Aug 5, 2010, when labeling 2WD SUVs, please continue to use the same vehicle classification category as in past model years (even though 2WD SUVs equal to or less than 6000 lbs GVWR will be included in 2011 and 2012 passenger car CAFEs). Similar to EPA policy for 2011 model year vehicles, EPA will require 2012 and later model year 2WD SUVs to continue to be included in the 2WD SUV comparable class for fuel economy labeling purposes, based on the provisions of 40 CFR 600.315-08(a)(1) and 600.315-08(a)(2) as revised in 74 FR 61537, November 25, 2009.

Fuel Costs: New 2012 fuel costs will be provided to manufacturers in a future EPA guidance letter. Until the 2012 model year fuel costs are provided, manufacturers should continue to use the 2011 model year fuel costs provided in EPA guidance letter CISD-10-14. Please contact Bob Peavyhouse (734-214-4814 or by email) or me if you need a fuel cost for LPG or Hydrogen.

Range of comparable vehicles: Until the 2012 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2011 model year ranges provided in CISD-10-19, Sept 13, 2010 (except if a model exceeds the 2011 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

If you have any questions, feel free to give your team member or me a call or send us an email message. I'm at

734-214-4450.

Regards

Cc: "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com] From: "Giles, Michael"

**Sent:** Fri 5/6/2011 11:58:57 AM

Subject: VW Group - Certificate Request for carryover test group CVWXT03.0HEV

Hello Jim,

We have submitted application documents and a certificate request for test group CVWXT03.0HEV (Touareg Hybrid).

Please note this is a carryover test group with no new models or tests.

Best Regards,

Mike

Michael Giles

**Certification Specialist** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Robert Peavyhouse/AA/USEPA/US@EPA[]
Cc: David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]
From: "Thomas, Richard (EEO)"
Sent: Mon 5/9/2011 6:29:07 PM

Subject: 2012 Volkswagen and Audi Fuel Economy Labels

I understand that Dave Ex. 6 this week, however he said that you may be able to process the query program so that any fixes I did and any new labels would be added to the first edition of the web site fuel economy guide.

After Dave's report from late Friday, I fixed problems with model index VWX026, 027 and 028 this morning and added new Volkswagen indexes VWX022, 023, 024, 025, 44, 45, 46 and two Audi indexes ADX040 and 041.

If you have any questions, or if I should direct this to someone else, please call.

Richard E. Thomas VOLKSWAGEN Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO) Phone: 248 754-4213

Fax: 248 754-4207 Richard.Thomas@VW.com

1

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael"

[michael.giles@vw.com]; Kissling, Karlheinz (N/EA-521)" [Karlheinz.Kissling@AUDI.DE]

From: "Rodgers, William"

**Sent:** Tue 5/10/2011 11:41:31 AM

Subject: VW Group - Vehicle ID: C3UK-AMQ shift schedules updated

image001.gif

william.rodgers@vw.com

Hello Jim,

We have updated the Supplemental Information for the follow vehicle to include all new manual transmission shift schedules. This vehicle is schedule for confirmatory testing no May 25th. Please be sure your lab receives this new information prior to testing.

From:

Verify Administrator

Subject:

Supplemental Information received

Date:

Tue 5/10/2011 7:31 AM

Your recent Supplemental Information submission has been received by the EPA and you will be notified if any additional actions on your part are required. A Submission Processing Report and any requested dataset reports can be found on the status history page. The status history page can be reached by clicking on the link near the bottom of this Inbox message.

The following is a summary of the processing report:

Total Datasets Submitted: 1 Accepted Datasets: 1 Rejected Datasets: 0

Vehicle ID: C3UK-AMQ

Vehicle Configuration #: 0

Thanks,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

To: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Hart, Robert (VWoA)" Wed 5/18/2011 6:33:27 PM
Subject:	Problem with Verify that requires EPA permission to correct.
Hello Jim,	
	Helpdesk said to inform you of this so that someone at the EPA can give them permission to ect this issue.
	submit either HWFET or SC03 tests to the Verify System we get the following business rule as an age for the submission.
equal to 'F	n Message Text: LD-CTD-TI-BR049a - If Test Results with Test Result/Emission Name (TI-19) E BAG 1' (Bag 1 Fuel Economy) is submitted then Test Results with Test Result/Emission Name al to 'FE BAG 2' (Bag 2 Fuel Economy) must also be submitted
	WFET or SCO3 tests are one bag tests. The business rule is asking for the 'FE BAG 2' results. no BAG 2 results to submit for either of these tests.
the trigger	his and some of the other problems we are having, I would have to say that someone pulled to launch this new module before it was fully tested.
was not fix	ve liked to participate in the testing, but my login for the test environment was messed up and ed by the time the testing ended.
Best regard	ds,
Bob Hart	
Robert Har	
Engineerin	g and Environmental Office

1

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Hart, Robert (VWoA)"

[Robert.Hart@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]

**Cc:** []

From: CN=Sandra Somoza/OU=AA/O=USEPA/C=US

**Sent:** Wed 5/18/2011 7:18:20 PM

**Subject:** Re: Fw: Problem with Verify that requires EPA permission to correct.

Bob,

What helpdesk number did you call and who did you talk too?

Sandra Somoza
U.S. Environmental Protection Agency
Office of Transportation and Air Quality
Compliance and Innovative Strategies Division
734 214-4704

somoza.sandra@epa.gov

From: Jim Snyder/AA/USEPA/US

To: Sandra Somoza/AA/USEPA/US@EPA

Date: 05/18/2011 02:52 PM

Subject: Fw: Problem with Verify that requires EPA permission to correct.

Sandra, It looks like Bob found a glitch in the new release. Who should I pass this on to?

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov
----- Forwarded by Jim Snyder/AA/USEPA/US on 05/18/2011 02:50 PM -----

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 05/18/2011 02:34 PM

Subject: Problem with Verify that requires EPA permission to correct.

Hello Jim,

The Verify Helpdesk said to inform you of this so that someone at the EPA can give them permission to check/correct this issue.

When we submit either HWFET or SC03 tests to the Verify System we get the following business rule as an error message for the submission.

Transaction Message Text: LD-CTD-TI-BR049a - If Test Results with Test Result/Emission Name (TI-19)

equal to 'FE BAG 1' (Bag 1 Fuel Economy) is submitted then Test Results with Test Result/Emission Name (TI-19) equal to 'FE BAG 2' (Bag 2 Fuel Economy) must also be submitted

Both the HWFET or SC03 tests are one bag tests. The business rule is asking for the 'FE BAG 2' results. There are no BAG 2 results to submit for either of these tests.

Based on this and some of the other problems we are having, I would have to say that someone pulled the trigger to launch this new module before it was fully tested.

I would have liked to participate in the testing, but my login for the test environment was messed up and was not fixed by the time the testing ended.

Best regards,

**Bob Hart** 

Robert Hart

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Phone: (248) 754-4224 Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: "Robert Hart" [Robert.Hart@vw.com]; erifyHelp@csc.com[]
Cc: CN=Sandra Somoza/OU=AA/O=USEPA/C=US@EPA;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;"Richard Thomas" [Richard.Thomas@VW.Com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Richard Thomas" [Richard.Thomas@VW.Com];

Richard Thomas" [Richard.Thomas@VW.Com]

From: CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US

**Sent:** Wed 5/18/2011 7:33:02 PM

**Subject:** Re: Fw: Problem with Verify that requires EPA permission to correct.

Bob / Verify Help,

The fuel economy results for the entire "Test" belong in a test result field named "MFR FE". Volkswagen has previously put them in the "FE BAG 1" results (incorrectly). Over the last year I have had Richard Thomas go back and resubmit several tests to move them to the "MFR FE" field. As you mentioned, this applies to both highway and SC03 tests.

"FE BAG 1" should only be used in cases where there are multiple bags, so "FE BAG 1" will not be accepted unless "FE BAG 2" is also present.

Likewise, "FE BAG3" will only be accepted if both "FE BAG 1" and "FE BAG2" are present, etc. In the case where there are multiple bags, the fuel economy for the entire "Test" should also be present in "MFR FE".

To help Richard out on several occasions in the past, I have made special provisions in the fuel economy calculations (specific for VW) to pull the fuel economy out of that field if "MFR FE" was left blank and BAG 2 was left blank. This was only to avoid him having to go back and resubmit all of the highway and SCO3 tests. I am trying to avoid having to do custom fixes whenever possible. Our contractor will be implementing the fuel economy calculations in the near future, and this business rule is intended to avoid them having to implement similar provisions when they perform the calculations.

The business rule is working as intended. Please enter the "Test" fuel economy results in "MFR FE".

Additional note: The litmus calculations are now performed by Verify. They require that "Verify Calculated Rounded Adjusted Fuel Economy" be calculated and stored for the FTP (75 degree), highway, and SC03 tests. They have always been calculated for the FTP and highway. Any SC03 test submitted before this deployment of the database may have to be resubmitted in order to get Verify to calculate this result. So you may need to resubmit some of your SC03 tests anyway. (Only the ones referenced as the "Official SC03 Test Number" in your test group submission)

Robert Peavyhouse

Compliance and Innovative Strategies Division U.S. EPA - Office of Transportation and Air Quality

phone: (734) 214-4814 fax: (734) 214-4869

email: peavyhouse.robert@epa.gov website: http://www.epa.gov/nvfel/

From: Sandra Somoza/AA/USEPA/US

To: Robert Peavyhouse/AA/USEPA/US@EPA

Date: 05/18/2011 02:55 PM

Subject: Fw: Problem with Verify that requires EPA permission to correct.

Bob,

Can you look into the error below? Is this one of the issues we are aware of?

Sandra Somoza
U.S. Environmental Protection Agency
Office of Transportation and Air Quality
Compliance and Innovative Strategies Division
734 214-4704
somoza.sandra@epa.gov
----- Forwarded by Sandra Somoza/AA/USEPA/US on 05/18/2011 02:55 PM -----

From: Jim Snyder/AA/USEPA/US

To: Sandra Somoza/AA/USEPA/US@EPA

Date: 05/18/2011 02:52 PM

Subject: Fw: Problem with Verify that requires EPA permission to correct.

Sandra, It looks like Bob found a glitch in the new release. Who should I pass this on to?

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov
----- Forwarded by Jim Snyder/AA/USEPA/US on 05/18/2011 02:50 PM -----

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 05/18/2011 02:34 PM

Subject: Problem with Verify that requires EPA permission to correct.

Hello Jim,

The Verify Helpdesk said to inform you of this so that someone at the EPA can give them permission to check/correct this issue.

When we submit either HWFET or SC03 tests to the Verify System we get the following business rule as an error message for the submission.

Transaction Message Text: LD-CTD-TI-BR049a - If Test Results with Test Result/Emission Name (TI-19) equal to 'FE BAG 1' (Bag 1 Fuel Economy) is submitted then Test Results with Test Result/Emission Name (TI-19) equal to 'FE BAG 2' (Bag 2 Fuel Economy) must also be submitted

Both the HWFET or SC03 tests are one bag tests. The business rule is asking for the 'FE BAG 2' results. There are no BAG 2 results to submit for either of these tests.

Based on this and some of the other problems we are having, I would have to say that someone pulled the trigger to launch this new module before it was fully tested.

I would have liked to participate in the testing, but my login for the test environment was messed up and was not fixed by the time the testing ended.

Best regards,

**Bob Hart** 

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Phone: (248) 754-4224 Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]
Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]
From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

**Sent:** Thur 5/19/2011 2:35:37 PM

**Subject:** 411 10206/12 411 1020612 05-18-11.pdf

Hel	lo	Во	h.

Please find enclosed the FTP, Hwy, & US06 for the Subject vehicle.

I checked with the Lab and we will not run the Diesel vehicle tomorrow. It will be next week. I'll contact you with a test date.

If you have any questions please contact Jim Snyder or me.

Thanks Bob,

Kind regards,

Vince Mazaitis



	<del></del>	***************************************	NVFEL	Laboratory T	est Data	<del>(1971-1974) ( crisini (1984) ( trisini (19</del>	WAREPERSONAL PROPERTY OF THE P	cvs
			atory Test Resu			s for Official Data		
	-		2011-0115-004	***************************************			411 10206 /12	da maile da a montal montal a maile a maile da a maile d
Test Information		Test Date:					VOLKSWAGE	
THITEO STAR		Start / Hot Soak:				MFR Codes:		VWX
	, F	uel Container ID:				Config #:		
		• • •	61 Tier 2 Cert To			Transmission:		
	j			?-day exhaust (w/c		Shift Schedule:		
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Ca	dculation Method:	Gasoline			Beginning Odometer:	003815.0 MI	
A PHOLE	l	Pretest Remarks:				Drive Schedule:	ftp3bag	
						Soak Period:	17.6 hours	
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Bag Data		HC-FID	CO	NOx	<u>CO2</u>	CH4	NonMeth HC	
Phase 1		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample		10.998	31.403	0.535	0.977	2.750		
Amblen		4.491	0.184	0.042	0.048	1.968		
Net Concentration	1	6.836	31.232	0.496	0.933	0.926	5.812	
	Remarks	;						
Phase 2								
Sample		5.609	0.732	0.241	0.658	1.946		
Ambien		5.836	0.303	0.037	0.047	1.959		
Net Concentration	1	0.060	0.444	0.206	0.613	0.083	-0.032	
	Remarks:	:						
Phase 3								
Sample	•	9.904	2.646	0.226	0.854	2,161		
Ambien		10.255	0.386	0.033	0.047	1.958		
Net Concentration	,	0.304	2.285	0.195	0.810	0.328	-0.059	
Phase 4	Remarks:							
Sample	,						•	
Amblen								
Net Concentration								
TO CONTOUND AND A	•							•
	Dansadas		•					
	Remarks:							
Results		HC-FID	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	NMHC / NMOG	Vol MPG
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
	Phase 1	0.087	0.804	0.019	377.3	0.014	0.074 / 0.077	23.558
	Phase 2	0.001	0.018	0.013	395.4	0.002	0.000 / 0.000	22.572
	Phase 3	0.004	0.059	0.008	327.1	0.005	0.000 / 0.000	27.281
	Weighted	0.01976	0.19227	0.01265	372.879		NMOG=1.04xNMHC 0.0154 / 0.0160	)
Fuel Economy		Gasoline MPG			J. L. 0/0	Dyno Settings	Dyno #:	D001
	Phase 1	23.50					Inertia:	
	Phase 2	22.52					EPA Set Co A:	
	Phase 3						EPA Set Co B:	
	,	_ · · · · · · · · · · · · · · · · · · ·				ž.	EPA Set Co C:	
					,	•	<del>-</del> -	
	Weighted	23.85		**************************************			Emiss-Bench:	
v101208 - d001E	mission 1105	18080442	w	Page 1 of 2			Print Time	18-May-2011 13:10

				Laboratory T				CVS
		Final Laborat	ory Test Resu	Its- Refer to VEF	IFY Reports for			
Results	-	Test Number: 2		N. 100			411 10206 /12	
		HC-FID	CO (grome)	NOx (arons)	<u>CO2</u>	CH4	NMHC	Meth Respon
SHITED STATE	Phase 1	(grams) 0.313	(grams) 2.887	(grams) 0.069	(grams)	(grams)	(grams)	1.106
(g (1) (g)	Phase 2	0.005	0.070	0.049	1354.6	0.049	0.266	
	Phase 3	0.014	0.070	0.027	1525.0 1173.2	0.008	0.000	
	1 11030 0	0.014	0.211	0.027	1173.2	0.017	0.000	
Vil PROVE								
est Conditions			Phase 1	Phase 2	Phase 3	Phase 4		
	Ba	arometer (inHg)	28.90	28.90	28.91	111030 4		
		ell Temp (degF)	73.12	73.16	73.20			
	De	w Point (degF)	50.10	50.05	50.01			
So		lity (grains/lbm)	55.66	55.56	55,47			
		Ox Corr Factor	0.9167	0.9163	0.9159			
		Dilution Factor	13.656	20.345	15.668			
	CFV Vr	mix (scf @68F)	2803.83	4799.31	2795.54			
	CVS Flow R	late Avg (scfm)	331.36	330.91	330,44			
		Fan Placement: O	ne Fan - Down	- Front				
		se Time (secs)	507.70	870.20	507.60			
		ilstance (miles) sis Time (secs)	3.590	3.857	3.587			
								P
	•							
	,							

MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number 1E+07

<u>HC</u> 0.0235

CO 0.28 <u>NOx</u> 0.008 <u>CO2</u> 372

<u>NMOG</u>

NonMeth HC

0.0178

<u>Odometer</u> 3689 M

**MPG** 23.9

PM

MPG Is 0.21 % higher than EPA MPG

0.004

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

MFR Lab: Volkswagen AG, Dept EASZ/1

v101208 - d001\_

\_Emission110518080442

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CERT

**VWX** 

**NVFEL Laboratory Test Data** 

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0115-006

Vehicle ID: 411 10206 /12

Test Information

Test Date: 5/18/2011

Key Start: 09:42:17

Fuel Container ID: F00023

Fuel Type: 61 Tier 2 Cert Test Fuel
Test Procedure: 03 HWFET (hwfetprep\_hwfet)

Calculation Method: Gasoline

Pretest Remarks:

MFR Name VOLKSWAGEN MFR Codes: 590

Config #: 00

Transmission: S

Shift Schedule: A09980011

Beginning Odometer: 003826.0 MI

Drive Schedule: hwfetwarmup\_hwfet

		Tanantin Markatan da karantan da markatan da markatan da markatan da markatan da markatan da markatan da marka		~			
Bag Data	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	NonMeth HC	
Phase 1	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	11.395	4.215	0.153	1.182	2.153		
Ambient	11.622	0.489	0.026	0.047	1.976		
Net Concentration	0.800	3.769	0.129	1.139	0.352	0.411	

Remarks:

Phase 2

Sample Amblent

Net Concentration

Remarks:

Phase 3

Sample Ambient

Net Concentration

Remarks:

Phase 4

Sample Ambient

Net Concentration

Remarks:

<u>Results</u>		HC-FID	CO	<u>NOx</u>	<u>CO2</u>	CH4	NMHC / NMOG	Vol MPG
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
1	Phase 1	0.005	0.051	0.003	240.0	0.003	0.003 / 0.003	37.178

(NMOG=1.04xNMHC)

Fuel Economy	G	iasoline MPG		Coastdwn secs:	19.24 .	Dyno Settings	Dyno #:	D001
	Phase 1	37.09			19.27		Inertia:	3750
					19.29		EPA Set Co A:	15.88
	•						EPA Set Co B:	0.0372
						±	EPA Set Co C:	0.01923
			•					
	***************************************				19.27		Emiss-Bench:	D001
v101208 - d001[	Emission110518	092203		Page 1 of 2			Print Time	18-May-2011 13:14

	AALEFFA	poratory rest	Dala	
Final Laboratory Te	et Reculte.	Refer to VERIEV	Reports for Official Dat	į,

Phase 2

Test Number: 2011-0115-006

Vehicle ID: 411 10206 /12

Results

Phase 1

HC-FID CO (grams)

<u>NOx</u> (grams) (grams) 0.518 0.027

CO<sub>2</sub> (grams) 2462.1

Phase 3

CH4 (grams) 0.028

Phase 4

**NMHC** (grams) 0.028

Meth Response 1.106

**CVS** 

Test Conditions

Phase 1 Barometer (inHg) 28.91 Avg Cell Temp (degF) 73.31 Dew Point (degF) 50.13 Specific Humidity (grains/lbm) 55.71 NOx Corr Factor 0.9169 CO2 Dilution Factor 11.322

0.054

CFV Vmix (scf @68F)

CVS Flow Rate Avg (scfm)

327.15

10.260

4171.76

Fan Placement: One Fan - Down - Front 765.20

Phase Time (secs) Distance (miles)

Bag Analysis Time (secs)

MFR Test Results

for Procedure 3 HWFE

MFR Number 1E+07

<u>HC</u> 0.0024 <u>CO</u> 0.02

**NOx** 0.002 CO<sub>2</sub> 238

**NMOG** 

NonMeth HC 0.0011

Odometer 3700 M

MPG

PM

0.004

37.3 MPG is 0.56 % higher than EPA MPG MFR Lab: Volkswagen AG, Dept EASZ/1

Fuel: 61 Tier 2 Cert Gasoline

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**NVFEL Laboratory Test Data** Final Laboratory Test Results- Refer to VERIFY Reports for Official Data Test Number: 2011-0115-005 Vehicle ID: 411 10206 /12 MFR Name VOLKSWAGEN Test Information Test Date: 5/18/2011 Key Start: 10:41:44 MFR Codes: 590 **VWX** Fuel Container ID: F00023 Config #: 00 Fuel Type: 61 Tier 2 Cert Test Fuel Transmission: S Test Procedure: 89 us062bag (us06warmup\_2bagus06) Shift Schedule: A09980041 Calculation Method: Gasoline Beginning Odometer: 003850.0 MI Pretest Remarks: Drive Schedule: us06warmup\_2bagus06 Bag Data HC-FID CO **NOx** CO<sub>2</sub> CH4 NonMeth HC (ppm) (ppm) (%) (ppm) Phase 1 (ppmC) (ppmC) Sample 10.295 15.815 0.734 0.960 2.650 6.710 **Amblent** 1.358 0.059 0.049 1.971 Net Concentration 4.067 14.555 0.679 0.915 0.821 3.159 Remarks: Phase 2 Sample 11.518 16.907 0.514 1.335 2.871 Amblent 1.350 0.049 6.769 0.060 1.961 Net Concentration 5.425 15.692 0.460 1.291 1.106 4.202 Remarks: Phase 3 Sample **Ambient Net Concentration** Remarks: Phase 4 Sample **Ambient Net Concentration** Remarks: Results HC-FID CO NOx CO<sub>2</sub> CH4 NMHC / NMOG Vol MPG (gpm) (gpm) (gpm) (gpm) (gpm) (mpg) (gpm) Phase 1 0.069 0.496 0.035 489.8 0.016 0.053 / 0.055 18.186 Phase 2 0.040 0.234 0.010 302.6 0.009 0.031 / 0.032 29.451 (NMOG=1.04xNMHC) Composite 0.04641 0.29213 0.01564 344.072 0.01091 0.0360 / 0.0374 Dyno #: D001 Fuel Economy Gasoline MPG Dyno Settings Phase 1 18.14 Inertia: 3750 Phase 2 29.38 EPA Set Co A: 15.88

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EPA Set Co B: 0.0372 EPA Set Co C: 0.01923

Emiss-Bench: D001

Composite

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25.84

			NVFEL	Laboratory T	est Data			cvs
		Final Laborato		lts- Refer to VEF		r Official Data		
***		Test Number: 2			•		D: 411 10206/12	
<u>Results</u>	·	HC-FID	co	NOx	CO2	CH4	NMHC	Meth Respon
CHILD STAR		(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	1.106
Age. Similar	Phase 1	0.122	0.880	0.061	869.4	0.028	0.095	
	Phase 2	0.250	1.459	0.064	1885.6	0.059	0.193	
	1	011001		0.001	1000.0	0.000	0.130	
	<i>(</i>							
St Paores								
	(PARTY TOTAL CO. L				*******************************	**************************************	######################################	
est Conditions			Phase 1	Phase 2	Phase 3	Phase 4		
<u>oor oonamono</u>	· .	arometer (inHg)	28.91	28.91	Friase 3	FIIdS# 4		
		ell Temp (degF)						
			73.49	73.78				
		ew Point (degF)	48.67	49.54				
5		dity (grains/lbm)	52.72	54.48				
		IOx Corr Factor	0.9052	0.9121				
		Dilution Factor	13.920	10.016				
	CFV Vi	mix (scf @68F)	1834.86	2819.34				
	•							
	CVS Flow R	Rate Avg (scfm)	466.49	463.45				
		Fan Placement: Or	ne Fan - Up - F	ront				
		se Time (secs)	130.00	365.00	106.00			4
	D	Distance (miles)	1.775	6.232				
		sis Time (secs)						
		` '						•
•								
	_							
FR Test Results	<u>s</u> . 10	or Procedure 90 U	S06					
<u> </u>	D. Marrier Iv	110			·			
<u>MF</u>	R Number	<u>HC</u>	<u>co</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	NonMeth HC	
	1E+07	0.0337	0.25	0.008	341	0	0.0256	
	<u>Odometer</u>	<u>MPG</u> PM			MFR Lab:	Volkswagen AG	G, Dept EASZ/1	
	3728 M	26	0.004					
	М	IPG is 0.62 % high	er than EPA M	IPG	Dyno:			
						61 Tier 2 Cert 0	Gasoline	
				•				

v101208 - d001\_

Page 2 of 2

Print Time 18-May-2011 13:12

Emission110518101633

To: richard.thomas@vw.com[]

**Cc:** christoph.kohnen@vw.com;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Thur 5/19/2011 8:13:51 PM

Subject: re: 2012 FE Label data in EPA data base as of May 13, 2011 is attached for your

review (including data sent to DOE for web posting)

VW 2012 FEGuide-5-13-2011.zip

verifyhelp@csc.com

Richard,

The attached 2012 FE Label data for the manufacturer(s) which you are handling were forwarded to DOE on May 17, 2010 for posting on the web at www.fueleconomy.gov. [Only releasable, non-confidential data were forwarded to DOE.] The attached spreadsheet(s) are encrypted & password protected using the same password which I gave you previously.

The attached spreadsheet(s) include all 2012 FE Label data in EPA's Verify data base as of May 13, 2011 approximately 2 hours before Verify Release 8 was deployed. Note that the attached spreadsheet(s) also include data which were not forwarded to DOE because the data contains errors or the release date was after May 24, 2010.

Releasable data will be posted on the web this week (the week of May 16, 2011). The models highlighted in green fill (if any) contain errors and were not sent to DOE for web posting. If the release date was prior to May 24, 2011 for these models, I'll be glad to send the corrected data to DOE for web posting after the errors have been corrected in Verify.

Please review the data and correct Verify if any errors still exist. Please contact me if you find any errors in the releasable data which was sent to DOE for web posting.

For your convenience, here are 1) EPA's May 18, 2011 list server message (explaining how to make corrections to data already in Verify before the May 13, 2011 deployment of Verify Release 8); and 2) my FE Label "reminders" which I sent to manufacturers in previous email messages:

EPA Verify List Server message, as sent to manufacturers on May 18, 2011:

Updated XML schemas, XML schema change log, data requirements and business rules are now available on the Verify website in support of the recent Light-Duty Greenhouse Gas and Fuel Economy updates (Release 8). [Available at http://www.epa.gov/otaq/verify; then click on "Publications," then click on "Light-Duty Vehicle (LDV)."]

If you have any questions or comments please contact the Verify Help Desk at (888) 890-1995 or via email at verifyhelp@csc.com.

As a reminder, in order to make any changes to datasets that were already in Verify prior to the Release 8 updates, you will need to:

- 1) select the "Request Database Report" in order to receive a newly formatted XML file for that dataset in your CDX in-box;
- 2) save that XML file on your workstation;
- 3) select the "Open Existing Dataset" option and select the XML file saved in step 2;
- 4) make any changes to the dataset using the Verify web forms;

5) submit the modified dataset.

## FE Label Reminders:

FE Labels with errors won't be posted on the web: FE Labels with errors (which are not corrected in EPA's Verify data base by May 11, 2011) will not be sent to DOE for posting on www.fueleconomy.gov. For example, FE Labels will not be sent to DOE for posting on www.fueleconomy.gov. if they contain errors in the unadjusted combined fuel economy value; errors in the adjusted city, highway or combined fuel economy value; missing interior volume/cargo volume information (required for passenger cars only--except not required for 2-seater vehicles); duplicate entries, etc.

Release date for 2011 Labels: Please be sure that the release date is correct in EPA's Verify data base. For the May release, we will post FE Labels on the web which have a release date of May 23, 2011 and earlier.

2WD SUV Classification: As outlined on page 6 of EPA guidance letter CISD-10-14, Aug 5, 2010, when labeling 2WD SUVs, please continue to use the same vehicle classification category as in past model years (even though 2WD SUVs equal to or less than 6000 lbs GVWR will be included in 2011 and 2012 passenger car CAFEs). Similar to EPA policy for 2011 model year vehicles, EPA will require 2012 and later model year 2WD SUVs to continue to be included in the 2WD SUV comparable class for fuel economy labeling purposes, based on the provisions of 40 CFR 600.315-08(a)(1) and 600.315-08(a)(2) as revised in 74 FR 61537, November 25, 2009.

Fuel Costs: New 2012 fuel costs will be provided to manufacturers in a future EPA guidance letter. Until the 2012 model year fuel costs are provided, manufacturers should continue to use the 2011 model year fuel costs provided in EPA guidance letter CISD-10-14. Please contact Bob Peavyhouse (734-214-4814 or by email) or me if you need a fuel cost for LPG or Hydrogen.

Range of comparable vehicles: Until the 2012 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2011 model year ranges provided in CISD-10-19, Sept 13, 2010 (except if a model exceeds the 2011 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

If you have any questions, feel free to give your team member or me a call or send us an email message. I'm at 734-214-4450.

Regards

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael"

[michael.giles@vw.com]; Rhodes, Brian" [Brian.Rhodes@vw.com]

From: "Rodgers, William"

**Sent:** Fri 5/20/2011 12:00:52 PM

Subject: VW Group - VID 411\_10206\_\_12 Release

winmail.dat

message body.rtf

Hello Jim,

Can you please release the Passat 3.6L VID 411\_10206\_12 so we can pick it up on Monday morning.

Thanks,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com <mailto:william.rodgers@vw.com>

/\_\_\. (o\\_l\_/o)

From: "Rodgers, William"

**Sent:** Fri 5/20/2011 3:26:30 PM

Subject: RE: VW Group - VID 411\_10206\_\_12 Release

mailto:william.rodgers@vw.com

Thanks.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Friday, May 20, 2011 11:15 AM

To: Rodgers, William

Subject: Re: VW Group - VID 411\_10206\_\_12 Release

Because the correlation between manufacturer's data and our initial test was so close, I don't want to use lab resources retesting the vehicle to get validated NOx results. We will use manufacturer's data as official results.

I released VID 411\_10206\_\_12. I noticed its already parked in the lot out front ready for pickup.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Rodgers, William" < William.Rodgers@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Cc:

"Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Giles, Michael" <michael.giles@vw.com>,

"Rhodes, Brian" < Brian. Rhodes@vw.com>

Date:

05/20/2011 08:01 AM

Subject:

VW Group - VID 411\_10206\_\_12 Release

Hello Jim,
Can you please release the Passat 3.6L VID 411_10206_12 so we can pick it up on Monday morning.
Thanks,
Bill Rodgers
Engineering and Environmental Office
VOLKSWAGEN Group of America, Inc. Rochester Hills, MI
United States
(248) 754-4219
(248) 754-4207
william.rodgers@vw.com <mailto:william.rodgers@vw.com></mailto:william.rodgers@vw.com>
/\. (o\_l_/o)
[attachment "winmail.dat" deleted by Jim Snyder/AA/USEPA/US] [attachment "message_body.rtf" deleted by Jim Snyder/AA/USEPA/US]

Cc: "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com] From: "Giles, Michael"

**Sent:** Fri 5/20/2011 8:05:52 PM

**Subject:** VW Group - VW Touareg Certificate Request - Test Group CVWXT03.6U76

Hi Jim,

Today we uploaded application docs and made a cert. request for CVWXT03.6U76 (VW Touareg).

Please let me know if there are any questions on this request.

Best regards,

Mike

Michael Giles

**Certification Specialist** 

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

Cc: "Kissling, Karlheinz (N/EA-521)" [Karlheinz.Kissling@AUDI.DE]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com]; Schuetze, Michael (N/EA-521)" [Michael.Schuetze@audi.de]

From: "Rodgers, William"

**Sent:** Mon 5/23/2011 11:36:07 AM

Subject: FW: VW Group - Vehicle ID: C3UK-AMQ shift schedules updated

winmail.dat

message\_body.rtf image001.gif

Hi Jim,

Just a reminder, we have the following Audi TTRS coming over to you today that requires the use of a new manual shift schedule.

Thanks,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

From: Rodgers, William

Sent: Tuesday, May 10, 2011 7:42 AM

To: Snyder, Jim

Cc: Hart, Robert (VWoA); Giles, Michael; Kissling, Karlheinz (N/EA-521) Subject: VW Group - Vehicle ID: C3UK-AMQ shift schedules updated

Hello Jim,
We have updated the Supplemental Information for the follow vehicle to include all new manual transmission shift schedules. This vehicle is schedule for confirmatory testing no May 25th. Please be sure your lab receives this new information prior to testing.
From:
Verify Administrator
Subject:
Supplemental Information received
Date:
Tue 5/10/2011 7:31 AM
Your recent Supplemental Information submission has been received by the EPA and you will be notified if any additional actions on your part are required. A Submission Processing Report and any requested dataset reports can be found on the status history page. The status history page can be reached by clicking on the link near the bottom of this Inbox message.
The following is a summary of the processing report:
Total Datasets Submitted: 1 Accepted Datasets: 1 Rejected Datasets: 0
Vehicle ID: C3UK-AMQ
Vehicle Configuration #: 0
Thanks,
Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

From: "Rodgers, William"

**Sent:** Mon 5/23/2011 1:32:18 PM

Subject: VW Group - VID C3UG-TAQ Confirmatory prep

winmail.dat message body.rtf

Hello Jim,

Our factory engineers have requested to be present when your lab starts the prep cycle for the above Audi Q7 diesel confirmatory vehicle. The engineers who will be present are: Mr. Karlheinz Kissling, Mr. Michael Schuetze and Mr. Sandro Olt.

Please let me know the time/day they should be available in the manufacturers room, Or if this request cannot be fulfilled.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com <mailto:william.rodgers@vw.com>

/\_\_\. (o\\_l\_/o) To: Jim Snyder/AA/USEPA/US@EPA[]
Cc: Vincent Mazaitis/AA/USEPA/US@EPA[]

From: "Rodgers, William"

**Sent:** Mon 5/23/2011 2:05:16 PM

Subject: RE: VW Group - VID C3UG-TAQ Confirmatory prep

william.rodgers@vw.com mailto:william.rodgers@vw.com

Thanks Jim.

Keep me advised of the latest.

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, May 23, 2011 9:56 AM

To: Rodgers, William

Cc: Mazaitis.Vincent@epamail.epa.gov

Subject: Re: VW Group - VID C3UG-TAQ Confirmatory prep

Thanks for the heads up. Latest word from the lab is that they can test Diesels starting Thursday so prep would be Wednesday. I don't yet have confirmation that they are planning to run both diesels that day.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:	"Rodgers, William" < William.Rodgers@vw.com>
То:	Jim Snyder/AA/USEPA/US@EPA
Date:	05/23/2011 09:32 AM
Subject:	VW Group - VID C3UG-TAQ Confirmatory prep
Hello Jin	n,
the prep	ory engineers have requested to be present when your lab starts cycle for the above Audi Q7 diesel confirmatory vehicle. The rs who will be present are: Mr. Karlheinz Kissling, Mr. Michael e and Mr. Sandro Olt.
	et me know the time/day they should be available in the cturers room, Or if this request cannot be fulfilled.
Thanks,	
Bill Rodg	gers
Enginee	ring and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI
United States
(248) 754-4219
(248) 754-4207
william.rodgers@vw.com <mailto:william.rodgers@vw.com></mailto:william.rodgers@vw.com>
/\. (o\_l_/o)
[attachment "winmail.dat" deleted by Jim Snyder/AA/USEPA/US] [attachment "message_body.rtf" deleted by Jim

Snyder/AA/USEPA/US]

From: "Rodgers, William"

Sent: Tue 5/24/2011 2:13:35 PM Subject: VW Group - DI submission

winmail.dat message body.rtf

Jim,

Give me a call if you need more clarification after reading the Decision Information that I just submitted for test group CADXV04.23UH.

Thanks,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com <mailto:william.rodgers@vw.com>

/\_\_\. (o\\_l\_/o) To: "Verify Help Desk" [verifyhelp@csc.com]

Cc: David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im

Snyder/AA/USEPA/US@EPA[]

From: "Thomas, Richard (EEO)"

Sent: Thur 5/26/2011 11:46:47 AM

Subject: 2012 Lamborghini Label Index #65

winmail.dat message\_body.rtf 20110526073341135.pdf

Hello Ex. 4 - CBI

The attached scan has the Verify error report for this Lamborghini Gallardo index #65. It was not accepted because the highway test has bag 1 values and they should not be there. We cannot change this data because it was an EPA confirmatory test. Who is responsible for correcting this old 2009 EPA test? I am sure there are a number of other EPA tests that must be corrected.

Thanks,

Richard E. Thomas

VOLKSWAGEN Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Engineering and Environmental Office (EEO)

Phone: 248 754-4213 Fax: 248 754-4207

Richard.Thomas@VW.com

From: Sent: Subject:	"Giles, Michael" Fri 5/27/2011 2:15:26 PM VW Group - Certificate Request in for CVWXV02.0U36	
Hello Jim,		
Today we submitted a request for certificate for test group CVWXV02.0U36 (VW Jetta). This test group is a carryover from BVWXV02.0MPI.		
We experienced some delay before getting the OBD approval, so our timing is rather tight. Any help you could provide from your end is greatly appreciated.		
Best regard	ds,	
Mike		
Michael Gi	iles	
Certificatio	on Specialist	
Engineerin	g and Environmental Office	
Volkswagen Group of America, Inc.		
3800 Haml	lin Road	
Auburn Hills, MI 48326		
United Sta	tes of America	
Phone +1-2	248-754-4229	
FAX +1-248	8-754-4207	

To:

Jim Snyder/AA/USEPA/US@EPA[]

David Good/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA[]; obert Cc:

Peavyhouse/AA/USEPA/US@EPA[] "Thomas, Richard (EEO)' From: Sent: Tue 5/31/2011 10:37:39 AM

Subject: FW: 2012 Lamborghini Label Index #65

winmail.dat message body.rtf 20110526073341135.pdf

#### Hello Jim;

As you can see from the mail below and the Verify help desk response, the EPA will have to repair the EPA confirmatory test to eliminate the bag 1 results from the test (#9ADX09010216). This new rule, that has affected most of our SC03 and Highway tests, does not permit a value to be entered in Bag 1. We had to fix several manufacture tests in order for the 2012 labels to be accepted into Verify. We are unable or permitted to change the data in an EPA test. Could you please investigate and let me know the outcome?

#### Thanks,

Richard E. Thomas VOLKSWAGEN Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO) Phone: 248 754-4213

Fax: 248 754-4207 Richard.Thomas@VW.com

Original M	essage	
From:	Ex. 6	@csc.com] On Behalf Of Verify Help
Desk		
Sent: Friday, N	/lay 27, 2011 3:34 PM	
To: Thomas, Richard (EEO)		

Subject: Re: 2012 Lamborghini Label Index #65

### Richard,

The rule is new since last friday's deployment. You will have to refer a different test or discuss this with your EPA cert.

### Ex. 6

Verify Help Desk Staffed by Computer Sciences Corporation, Contractor to the **Environmental Protection Agency** 

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Thomas, Richard

(EEO)"

<Richard.Thomas@v

То

w.com> Verify Help Desk@CSC

СС

05/26/2011 07:46 <Good.David@epamail.epa.gov>,

AM <snyder.jim@epa.gov>

Subject

2012 Lamborghini Label Index #65

Hello Ex. 6

The attached scan has the Verify error report for this Lamborghini Gallardo index #65. It was not accepted because the highway test has bag 1 values and they should not be there. We cannot change this data because it was an EPA confirmatory test. Who is responsible for

correcting this old 2009 EPA test? I am sure there are a number of other EPA tests that must be corrected.

Thanks,

Richard E. Thomas VOLKSWAGEN Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO) Phone: 248 754-4213

Fax: 248 754-4207 Richard.Thomas@VW.com

(See attached file: 20110526073341135.pdf)

Cc: Vincent Mazaitis/AA/USEPA/US@EPA;"Glas, Tobias (EASZ/1)"

[tobias.glas@volkswagen.de]; Glas, Tobias (EASZ/1)" [tobias.glas@volkswagen.de]; Hart, Robert

(VWoA)" [Robert.Hart@vw.com] **From:** "Rodgers, William"

**Sent:** Tue 5/31/2011 7:14:12 PM

Subject: RE: 411 10208-12\_5-26-11 Laboratory Test Data

william.rodgers@vw.com

Hello Jim,

Volkswagen has decided to accept the US06 and Highway tests for this vehicle.

We would like to request that the FTP rerun take place this week. Please let me know as soon as you have a test date/time scheduled.

Regards,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o) From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, May 31, 2011 9:54 AM

To: Rodgers, William

Cc: Mazaitis.Vincent@epamail.epa.gov

Subject: Fw: 411 10208-12\_5-26-11 Laboratory Test Data

Here's the Diesel Passat data. The FTP data was voided due to CH4 span check and will have to be rerun. Let me if VW accepts the US06 and Hwy.

I haven't seen any of the recent tests in Verify yet but hopefully we will later this morning.

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov
----- Forwarded by Jim Snyder/AA/USEPA/US on 05/31/2011 09:46 AM -----

From:

Vincent Mazaitis/AA/USEPA/US

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

05/31/2011 08:16 AM

Subject:

411 10208-12\_5-26-11 Laboratory Test Data

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: Vincent Mazaitis/AA/USEPA/US@EPA;"Hart, Robert (VWoA)" [Robert.Hart@vw.com];

Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Schuetze, Michael (N/EA-521)"

[Michael.Schuetze@audi.de] "Rodgers, William" From:

Sent: Tue 5/31/2011 7:29:05 PM

Subject: RE: Audi Q7 data william.rodgers@vw.com

Hello Jim,

Audi has decided to accept the confirmatory test results for the Audi Q7 TDI, VID B3UG-TAQ. Please release the vehicle for pick up.

Regards,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, May 26, 2011 5:16 PM

To: Rodgers, William

Cc: Mazaitis.Vincent@epamail.epa.gov

Subject: Audi Q7 data

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Rodgers, William"

**Sent:** Wed 6/1/2011 11:34:40 AM

**Subject:** RE: Audi Q7 data william.rodgers@vw.com

mailto:Snyder.Jim@epamail.epa.gov

Ok thanks.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, May 31, 2011 4:45 PM

To: Rodgers, William

Cc: Schuetze, Michael (N/EA-521); Hart, Robert (VWoA); Mazaitis. Vincent@epamail.epa.gov

Subject: RE: Audi Q7 data

That's good but I think we should wait until the data appears in Verify first. I heard they fixed a bug that was holding up transfers.

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From:

"Rodgers, William" < William.Rodgers@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Cc:

Vincent Mazaitis/AA/USEPA/US@EPA, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Schuetze, Michael (N/EA-521)" <Michael.Schuetze@audi.de>

Date:

05/31/2011 03:30 PM

Subject:

RE: Audi Q7 data

#### Hello Jim,

Audi has decided to accept the confirmatory test results for the Audi Q7 TDI, VID B3UG-TAQ. Please release the vehicle for pick up.

Regards,

Bill Rodgers
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI United States (248) 754-4219 (248) 754-4207 william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, May 26, 2011 5:16 PM

To: Rodgers, William

Cc: Mazaitis.Vincent@epamail.epa.gov

Subject: Audi Q7 data

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Rodgers, William"

**Sent:** Wed 6/1/2011 1:27:20 PM

Subject: RE: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Thanks for trying.

Please remind the lab to put it on a battery charger once it comes inside as discussed.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 01, 2011 9:20 AM

To: Rodgers, William

Subject: Fw: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Passat is scheduled for Tuesday. Sorry, they couldn't squeeze it in this week.

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov
----- Forwarded by Jim Snyder/AA/USEPA/US on 06/01/2011 09:19 AM -----

From:

VerifyAdministrator@verify-as1.epa.gov

To:

Jim Snyder/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA

Date:

06/01/2011 09:15 AM

Subject:

Confirmatory Test Date assigned for (411 10208 /12 / 0)

### PLEASE DO NOT REPLY TO THIS EMAIL!

A Confirmatory Test Date has been set for the following vehicle:

Test Date: 06/07/2011 Manufacturer: VWX Vehicle ID: 411 10208 /12 Vehicle Configuration: 0

From: "Rodgers, William"

**Sent:** Wed 6/1/2011 1:51:18 PM

Subject: RE: Confirmatory Test Date assigned for (411 10208 /12 / 0)

mailto:Snyder.Jim@epamail.epa.gov

Cool thanks.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 01, 2011 9:50 AM

To: Rodgers, William

Subject: RE: Confirmatory Test Date assigned for (411 10208 /12 / 0)

I sent them a note about charging.

I think we'll see the Q7 data in Verify today.

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From:

"Rodgers, William" < William.Rodgers@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

06/01/2011 09:27 AM

Subject:

RE: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Thanks for trying.

Please remind the lab to put it on a battery charger once it comes inside as discussed. Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 01, 2011 9:20 AM

To: Rodgers, William

Subject: Fw: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Passat is scheduled for Tuesday. Sorry, they couldn't squeeze it in this week.

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov
----- Forwarded by Jim Snyder/AA/USEPA/US on 06/01/2011 09:19 AM -----

From:

VerifyAdministrator@verify-as1.epa.gov

To:

Jim Snyder/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA

Date:

06/01/2011 09:15 AM

Subject:

Confirmatory Test Date assigned for (411 10208 /12 / 0)

PLEASE DO NOT REPLY TO THIS EMAIL!

A Confirmatory Test Date has been set for the following vehicle :

Test Date: 06/07/2011 Manufacturer: VWX Vehicle ID: 411 10208 /12 Vehicle Configuration: 0

From: "Rodgers, William"

**Sent:** Thur 6/2/2011 1:25:20 PM

**Subject:** RE: Audi Q7 data william.rodgers@vw.com

mailto:Snyder.Jim@epamail.epa.gov

Hi Jim,

Three of the four Q7 test results came through in Verify last night. It appears that the (89) US06 2-bag is MIA. Can you check on it or should I call the help desk?

Thanks, Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, May 31, 2011 4:45 PM

To: Rodgers, William

Cc: Schuetze, Michael (N/EA-521); Hart, Robert (VWoA); Mazaitis. Vincent@epamail.epa.gov

Subject: RE: Audi Q7 data

That's good but I think we should wait until the data appears in Verify first. I heard they fixed a bug that was holding up transfers.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Rodgers, William" < William.Rodgers@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Cc:

Vincent Mazaitis/AA/USEPA/US@EPA, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Schuetze, Michael (N/EA-521)" <Michael.Schuetze@audi.de>

Date:

05/31/2011 03:30 PM

Subject:

RE: Audi Q7 data

Hello Jim,

Audi has decided to accept the confirmatory test results for the Audi Q7 TDI, VID B3UG-TAQ. Please release the vehicle for pick up.

Regards,

Bill Rodgers
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI United States (248) 754-4219 (248) 754-4207 william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, May 26, 2011 5:16 PM

To: Rodgers, William

Cc: Mazaitis.Vincent@epamail.epa.gov

Subject: Audi Q7 data

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

To: David Good/AA/USEPA/US@EPA[]  Cc: Jim Snyder/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Linc  Wehrly/AA/USEPA/US@EPA; Ex. 7 @vw.com]; oberts  French/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA; Ex. 7
[
From: Ex. 7 Sent: Thur 6/2/2011 4:00:27 PM Subject: Lamborghini Roadster Suppress from Fuel Economy Guide
winmail.dat message_body.rtf
Hello Dave;
Sorry about all the fuss about this Lamborghini model and the communication that EPA got from the Lamborghini agency. As you know our office labeled the Aventador Coupe and Aventador Roadster (carline 476) back in January with a release date of February 28th. This was all good at that time. Today we learned that the Aventador Roadster will most likely not be built during the 2012 production year, but more likely as the 2013 model year starts production. Since this 2012 Roadster model will most likely not be available, we request that it be suppressed or removed from the online fuel economy guide.
Once we get the litmus test issues from Verify resolved, as we are having trouble to enter new labels and correct already issued labels into Verify, I will change the release date of the Lamborghini Aventador Roadster, label index 06.
If you have any questions, please call me.
Best regards,
Ex. 7  VOLKSWAGEN Group of America, Inc. 3800 Hamlin Road
Auburn Hills, MI 48326  Ex. 7
Ex. 7

From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[]  [Ex. 7]  Tue 6/7/2011 11:07:24 AM  RE: cert req
Jim,	
Thanks for	the heads up. Mike Giles will handle the resubmission this morning.
	etter of explanation we owe you for the TTRS start up procedure is being reviewed by <b>Ex. 7</b> so get that to you today.
Ex. 7	
Jim Snyde Light-Duty Compliance	v Vehicle Group se and Innovative Strategies Division stes Environmental Protection Agency

snyder.jim@epa.gov

From: "Rodgers, William"

Sent: Tue 6/7/2011 1:39:12 PM

Subject: TTRS Start up procedure

Vehicle Start Procedure for EPA - C3UK AMQ 2sec delay.doc

william.rodgers@vw.com

Jim,

As discussed here is the updated start up procedure for the TTRS.

Thanks,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o)

# Vehicle ID: C3UK - AMQ

# **Starting Instructions:**

- Place gearshift lever into "NEUTRAL "
- Apply the parking brake (brake handle in center console)
- Press the clutch pedal to the very far end
- Turn ignition key to "Ignition On" position. Wait at least 2 seconds
   before starting the engine by turning ignition key to "Start" position.
   Thereafter release the key.

## Location of Fuel Tank Drain Hoses:

• Two rubber hoses to the right of the passenger seat (one rubber hose for each chamber of the saddle fuel tank).

## Location of Fuel Filler Door and Trunk Lid Release:

 Two buttons on the left door panel below the armrest with corresponding symbols

# Engine hood release:

· Lever on the A-pillar

## **Traction Control:**

TCS is deactivated as well as Anti Lock Brake.
 No special button must be pushed.
 Please ignore all the Warning Lights and Symbols (TPMS, TCS, ABS, BRAKE) on the dashboard illuminated as a consequence of the conversion to front wheel drive as well as the potential warning buzzer.

## Gearshift Pattern:

Regular 6-speed gearshift pattern with neutral position in shift lane 34.
 To go into reverse you have to push the gearshift lever down.

R	1	3	5
	2	4	6

## Fan Placement:

Centered in front of the car

From: "Rodgers, William"

**Sent:** Tue 6/7/2011 2:27:59 PM

Subject: RE:

Jim,

The cooling fan should be positioned slightly tilted upward to avoid air flow escaping under the car. This was previously done by your lab tech. at the request of Karlheinz.

Thanks,

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 07, 2011 10:01 AM

To: Rodgers, William

Subject:

The Audi TTRS will run at 7 tomorrow morning.

There seems some confusion with fan position between the vehicle sheet and the representative. You might want to ask Carl Heinz what he wants on the TTRS. I don't remeber if it was an issue on it or just the Q7.

I have the start sheet, thanks.

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

Cc: "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com] From: "Giles, Michael" Sent: Tue 6/7/2011 7:04:30 PM Subject: VW Group - CVWXT03.6U76 Certificate Request
Cubject. VVV Croup CVVVX100.0070 Continuate Request
Hello Jim,
Today we re-submitted the certificate request for test group CVWXT03.6U76. The original request was rejected. I believe this should be ok now, but please let me know if any other changes are required.
Thanks,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229

FAX +1-248-754-4207

To:

Jim Snyder/AA/USEPA/US@EPA[]

**From:** "Thomas, Richard (EEO)" **Sent:** Wed 6/8/2011 10:36:37 AM

Subject: RE: FW: 2012 Lamborghini Label Index #65

mailto: Ex. 6 @csc.com

That Bob really knows his stuff, doesn't he? We have one of those Bob types, here too.

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, June 07, 2011 2:41 PM

To: Thomas, Richard (EEO)

Subject: Re: FW: 2012 Lamborghini Label Index #65

I caught up with Bob , All test data will be re-loaded including EPA LOD data and even older data migrated from CEFEIS. So the C/O data should appear. Give it another day.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Thomas, Richard (EEO)" < Richard. Thomas@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Cc:

David Good/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA

Date:

05/31/2011 06:39 AM

Subject:

FW: 2012 Lamborghini Label Index #65

Hello Jim;

As you can see from the mail below and the Verify help desk response, the EPA will have to repair the EPA confirmatory test to eliminate the bag 1 results from the test (#9ADX09010216). This new rule, that has affected most of our SC03 and Highway tests, does not permit a value to be entered in Bag 1. We had to fix several manufacture tests in order for the 2012 labels to be accepted into Verify. We are unable or permitted to change the data in an EPA test. Could you please investigate and let me know the outcome?

Thanks,

Richard E. Thomas VOLKSWAGEN Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 Engineering and Environmental Office (EEO) Phone: 248 754-4213

Fax: 248 754-4207 Richard.Thomas@VW.com

Ori	ginal Message	
From:	Ex. 6	്ടു@csc.com] On Behalf Of Verify Help
Desk		
Sent: F	riday, May 27, 2011 3:34 PM	
To: The	omas, Richard (EEO)	
Subjec	t: Re: 2012 Lamborghini Label	ndex #65

Richard,

The rule is new since last friday's deployment. You will have to refer a different test or discuss this with your EPA cert.

Ex. 6

Verify Help Desk Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Thomas, Richard

(EEO)"

<Richard.Thomas@v

To

w.com> Verify Help Desk@CSC

СС

05/26/2011 07:46 <Good.David@epamail.epa.gov>,

AM <snyder.jim@epa.gov>

Subject

2012 Lamborghini Label Index #65



The attached scan has the Verify error report for this Lamborghini Gallardo index #65. It was not accepted because the highway test has bag 1 values and they should not be there. We cannot change this data because it was an EPA confirmatory test. Who is responsible for correcting this old 2009 EPA test? I am sure there are a number of other EPA tests that must be corrected.

Thanks,

Richard E. Thomas
VOLKSWAGEN Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
Engineering and Environmental Office (EEO)

Phone: 248 754-4213

Fax: 248 754-4207

Richard.Thomas@VW.com

(See attached file: 20110526073341135.pdf)

[attachment "winmail.dat" deleted by Jim Snyder/AA/USEPA/US] [attachment "message\_body.rtf" deleted by Jim

Snyder/AA/USEPA/US] [attachment "20110526073341135.pdf" deleted by Jim Snyder/AA/USEPA/US]

To: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]

From: CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Wed 6/8/2011 1:39:54 PM

Subject: Re: VW Group - CVWXT03.6U76 Certificate Request

Okay, I finally remembered to delete the requests this morning. You can re-submit them and they should be fine.

The same problem that kept the STP composite calculated values from showing also effected the CSI data printouts in the Part One Application pdf files of the VW and 2 Audi applications that just denied. Those Part One pdf files will need to be revised with new CSI summaries printouts. I don't think you need to wait on re-submitting the Cert request over revising the pdf if you are running tight on the certificate timing.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US

To: "Giles, Michael" < michael.giles@vw.com>

Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>

Date: 06/07/2011 06:20 PM

Subject: Re: VW Group - CVWXT03.6U76 Certificate Request

It looked okay. I approved it. I will deny the others and you can re-submit them.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William" < William.Rodgers@vw.com>, "Hart, Robert (VWoA)" < Robert.Hart@vw.com>

Date: 06/07/2011 03:04 PM

Subject: VW Group - CVWXT03.6U76 Certificate Request

Hello Jim,

Today we re-submitted the certificate request for test group CVWXT03.6U76. The original request was rejected. I believe this should be ok now, but please let me know if any other changes are required.

Thanks, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William"

[William.Rodgers@vw.com] From: "Giles, Michael"

**Sent:** Wed 6/8/2011 6:05:29 PM

Subject: VW Group - Certificate Request CVWXV02.0U36

Hi Jim,

Thanks for the note. I re-submitted test group information for CVWXV02.0U36 as well as the certificate request. I will update the application CSI later this week.

- Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 08, 2011 9:40 AM

To: Snyder.Jim@epamail.epa.gov

Cc: Giles, Michael; Hart, Robert (VWoA); Rodgers, William Subject: Re: VW Group - CVWXT03.6U76 Certificate Request

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Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

Jim Snyder/AA/USEPA/US

To:

"Giles, Michael" < michael.giles@vw.com>

Cc:	"Hart, Robert (VWoA)" <robert.hart@vw.com>, "Rodgers, William" <william.rodgers@vw.com></william.rodgers@vw.com></robert.hart@vw.com>	
Date:	06/07/2011 06:20 PM	
Subject	: Re: VW Group - CVWXT03.6U76 Certificate Request	
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Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov		
From:	"Giles, Michael" < michael.giles@vw.com>	
To:	Jim Snyder/AA/USEPA/US@EPA	
Cc:	"Rodgers, William" <william.rodgers@vw.com>, "Hart, Robert (VWoA)" <robert.hart@vw.com></robert.hart@vw.com></william.rodgers@vw.com>	
Date:	06/07/2011 03:04 PM	
Subject	: VW Group - CVWXT03.6U76 Certificate Request	

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Hello Jim,

Thanks, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[] **From:** "Rodgers, William"

**Sent:** Wed 6/8/2011 6:45:50 PM

Subject: RE: VW Group - Certificate Request Denials

Jim,

The revised applications and new certificate requests have been processed.

Thanks,

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, June 08, 2011 9:40 AM

To: Snyder.Jim@epamail.epa.gov

Cc: Giles, Michael; Hart, Robert (VWoA); Rodgers, William Subject: Re: VW Group - CVWXT03.6U76 Certificate Request

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Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From:

Jim Snyder/AA/USEPA/US

To:

"Giles, Michael" < michael.giles@vw.com>

Cc:

"Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>

Date:	06/07/2011 06:20 PM	
Subject	: Re: VW Group - CVWXT03.6U76 Certificate Request	
It looke	d okay. I approved it. I will deny the others and you can re-submit them.	
Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency		
	14-4946 jim@epa.gov	
From:	"Giles, Michael" <michael.giles@vw.com></michael.giles@vw.com>	
То:	Jim Snyder/AA/USEPA/US@EPA	
Cc:	"Rodgers, William" <william.rodgers@vw.com>, "Hart, Robert (VWoA)" <robert.hart@vw.com></robert.hart@vw.com></william.rodgers@vw.com>	
Date:	06/07/2011 03:04 PM	
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Michael Giles
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Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: william.rodgers@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]
From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

**Sent:** Thur 6/9/2011 11:31:03 AM **Subject:** C3UK-AMQ 6-8-2011 C3UK-AMQ 6-8-2011.pdf

Good morning Bill,

As per our phone conversation this morning, please find enclosed the Laboratory Test Data for the Subject vehicle.

If you have any questions, please let Jim or me know.

Thanks,

Vince Mazaitis

(ERT

		**************************************		*****				CERT
			NVFEL	Laboratory T	est Data			CVS
				s- Refer to VEF	RIFY Reports	for Official Data		
		Test Number:	2011-0170-026			Vehicle ID:	C3UK-AMQ	
Test Information		Test Date:	6/8/2011			MFR Name	AUDI	
UNITED STATES	Key S	Start / Hot Soak:	08:31:59 / 10:01			MFR Codes:	640	ADX
in cui	Fi	el Container ID:	F00023			Config #:		
3			61 Tier 2 Cert Te	st Fuel		Transmission:		
[8 <b>[7]</b> [8]			21 Federal fuel 2		Ican Ioa	Shift Schedule:		
(3)		culation Method:		day calladat (4)		Beginning Odometer:		
THE PROTECT		retest Remarks:	Casoniio		•			
and the state of t	F	ielesi Nemarks.		*		Drive Schedule:		
						Soak Period:	17.5 Hours	
Bag Data		HC-FID	CO	NOx	CO2	CH4	NonMeth HC	
<u>Dag Data</u> Phase 1		(ppmC)	(ppm)		(%)		***************************************	
Sample		8.005	40.692	(ppm) 1.872	1.089	(ppm) 2.566	(ppmC)	
Ambien		2,238	0.357	0.014	0.047	2.063		
Net Concentration		5.950	40.364	1.859	1.045	0.671	E 224	
IVEL CONCENTIATION		5.850	40.304	1.008	1.045	0.071	5.221	
	Remarks:							
Phase 2	· winaino.							
Sample	•	2.626	1.459	0.266	0.736	1.948		
Ambient		2.233	0.044	0.010	0.736	2.071		
Net Concentration		0.515	1.417	0.257	0.692	-0.009	0.515	
rec concentration	•	0.515	1.411	0.201	0.032	-0.008	0.010	
	Remarks:							
Phase 3	110111011101							
Sample		2.606	10.902	0.158	0.935	2.118		
Ambient		2.278	0.034	0.007	0.046	2.060		
Net Concentration		0.487	10.870	0.152	0.892	0.202	0.267	
		00.	70.070	0.702	0.002	0.202	0.207	
	Remarks:							
Phase 4								
Sample								
Ambient								
Net Concentration								
	Remarks:	This test has par	ticulate results.					
	,							
Results		HC-FID	CO	NOx	CO2	CH4	NMHC / NMOG	Vol MPG
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
	Phase 1	0.076	1.044	0.074	424.9	0.010	0.067 / 0.070	20.915
	Phase 2	0.011	0.058	0.016	447.7	0.000	0.011 / 0.011	19.933
	Phase 3	0.006	0.280	0.006	361.9	0.003	0.003 / 0.004	24.634
						3,000	3.222, 0.004	;
							(NMOG=1.04xNMHC	)
	Weighted	0.02296	0.32383	0.02550	419.353		0.0203 / 0.0211	•
uel Economy	Charles Company of the Company of th	Gasoline MPG		<del>eQ(####################################</del>	33003300333M1333K0M3XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	Dyno Settings	NAME AND ADDRESS OF THE OWNER, WHEN PARTY OF T	D329 - FWD
	Phase 1	20.87					Inertia:	
	Phase 2	19.89					EPA Set Co A:	
	Phase 3	24.58					EPA Set Co B:	
							EPA Set Co C:	
						<u>1</u>	m, 7, 001 00 0.	wasten the T
	Weighted	21.22	•	-	•	•	Emiss-Bench:	Mexa 7200dle
	AVDAEm1106	A TO WAR IN A STATE OF THE STAT		age 1 of 2				ne 08-Jun-2011 13:5
						······	cing IIII	O.O. HVATERV VV -

CVS				Laboratory Te				
			IFY Reports for (	ts- Refer to VER	ory Test Resul	Final Laborat Test Number: 2		
		Vehicle ID:	CO3	NOx	CO	HC-FID		Results
eth Respons 1.087	<u>NMHC</u> (grams)	<u>CH4</u> (grams)	<u>CO2</u> (grams)	(grams)	(grams)	(grams)		JUITED STATES
	0.240	0.036	1526.7	0.267	3.751	0.274	Phase 1	
	0.041	0.000	1726.0	0.063	0.225	0.041	Phase 2	
	0.012	0.011	1298.9	0.022	1.007	0.022	Phase 3	
	<u> </u>		**************************************					PROTES!
		Phase 4	Phase 3	Phase 2	Phase 1			est Conditions
			28.95	28.95	28.95	rometer (InHg)	Ba	
			75.27	75.10	74.42	ll Temp (degF)	Avg Ce	
			52.68	52.75	52.63	w Point (degF)	De	
			61.22	61.38	61.10	ity (grains/lbm)	cific Humidi	Spe
			0.9392	0.9398	0.9387	Ox Corr Factor		
			14.311	18.199	12.253	Dilution Factor	CO2	
			2786.95	4777.34	2796.30	nix (scf @68F)	CFV Vn	
			2809.21	4815.67	2818.56	mix (scf@68F)	Total Vi	
			330.01	329.51	331.12	ate Avg (scfm)	OVS Flow Ra	C
				ront	ne Fan - Up - F	an Placement: O		
			506.70	869.90	506.70	se Time (secs)		
			3.589	3.856	3.593	istance (miles)		
			140.1	247.3	1003.8	is Time (secs)	Bag Analys	
			3.589	3.856	3.593		Di	

MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number 1E+07

<u>HC</u> 0.0307 <u>CO</u> 0.48

<u>NOx</u> 0.01 CO2

**NMOG** 0

MFR Lab: Audi AG Neckarsulm

NonMeth HC 0.0258

<u>Odometer</u> 4157 M

**MPG** 

22.7

MPG is 6.96 % higher than EPA MPG

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

v101208 - d329\_ \_EPAVDAEm110608074621 Page 2 of 2

Print Time 08-Jun-2011 13:51

	······································		<del>~~~</del>	NVFEL	Laboratory Te	est Data		D/	ARTICULATE
			Final Labor		ilts- Refer to VER		for Official Data		MINOULAIL
		-		2011-0170-026				C3UK-AMQ	
Test Info	rmation		Test Date:				MFR Name		
THITED	STATES	Const		08:31:59 / 10:0	1		MFR Codes:		ADX
1/8 C	्रे हो	ruei	Container ID:	61 Tier 2 Cert 7	Cost Evol		Config #: Transmission:		
1 3	<b>7</b> 7 §	Tes			2-day exhaust (w/d	ran Ina	Shift Schedule:		
1/3			ation Method:		E day exidest (viii		eginning Odometer:		·
VAL PR	OLECA		est Remarks:				Drive Schedule:		
							Soak Period:		
		**************************************						All filter weights are	corrected for buoyancy.
<u>Particula</u>		_	<u>Filter</u>	<u>Tare</u>	Gross	<u>Net Wt</u>	Total Mass	Total Mass	<u>Filter</u>
Phase 1	Samplei	Α	No. 184001	(Pre Wt) 136.3177	(Post Wt) 136.3688	mg	mg	mg/mi	comment
Filase I		В	184001	137.6702	137.7220	0.05112 0.05183	19.388 19.702	5.396 5.483	
		č	184007	135.3500	135.3956	0.03163	17.359	4.831	
		•		.00.000	100.000	0.04002	11.000	4.031	
	Remarks:							•	
Phase 2		Α	184211	138,4124	138,4445	0.03210	40.404	0.400	
I HUSU E		В	184212	137.8821	137.9097	0.03210	12.104 10.404	3.139 2.698	
		č	184213	135.4058	135.4336	0.02780	10.472	2.716	
						0,0	1 4/1 17 1	2.7 10	
	Remarks:								
Phase 3		Α	184348	139.3521	420 2770	0.00500	0.700	0.700	
<u> </u>		В	184349	138.6200	139.3779 138.6453	0.02580 0.02530	9.763 9.578	2.720 2.668	
		č	184398	137.1365	137.1618	0.02530	9.578	2.669	
							0.0.0	2.000	
	Remarks:						•	•	•
Phase 4									
<u> </u>									
	Remarks:	Thi	e taet hae nari	iculate results.			•	•	•
	, torramo,	1 7 13:	o teot nao pan	iculato results.					
Average F	Results	THE RESERVE AND ADDRESS OF THE PARTY OF THE		<del>(274)</del>		Net Wt	Total Mass	Total Mass	
						mg	mg	mg/ml	1
	Phas					0.04952	18.816	5.237	
	Phas					0.02917	10.993	2.851	
	Phas	83				0.02546	9.640	2.686	
			,	All filter weights are o	corrected for buoyancy.				I
	*** * * * * * * * * * * * * * * * * * *								
Dafarra	Weighted All							3.30049	***************************************
N	<u>Filter Stabili</u> /g Net or 0.01		<u>:K</u> No.	<u>Tare</u> (Pre Wt)	Gross (Post MIN	Net Wt	Stability Check		D329 - FWD
270 VI MY	-	.01	1	137.00886	(Post Wt) 137.00903	mg 0.00017	PASS/FAIL PASS	Inertia: EPA Set Co A:	3
	V		2	138.21750	138.21667	-0.00083	PASS	EPA Set Co A:	
						5.5000	. 7.00	EPA Set Co C:	
	ina prostant					***************************************		Emissions Benc	······································
v101208 - d3	129EPAVDAE	:m110608	w/4621	ecentric de la companya de la compa	Page 1 of 2			Print Tir	ne 08-Jun-2011 13:51

(5° 1830)				L Laboratory Te			PARTICULATI
	2)			ults- Refer to VERIF	Y Reports for		
MEICHING	CHAMBER	Test Number: 2					C3UK-AMQ
WEIGHING		Buoyancy	<u>Operator</u>	Chamber Temp	Dew Point	<u>Barometer</u>	Last Change in Status
Des toot	Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp
Pre-test	6/7/11 14:57	1.0011096	022298	70.9	49.6	28.92	NORM @ 06/07/11 14:26:48
Post-test	6/8/11 12:36	1.0011101	022298	71	48.6	28.94	NORM @ 06/07/11 14:26:48
Test Condit	ions		Phase 1	Phase 2	Phase 3	Phase 4	
	В	arometer (inHg)	28.95	28.95	28.95		
		ell Temp (deaF)	74.42	75.10	75.27		
		ew Point (degF)	52.63	52.75	52.68		
		dity (grains/lbm)	61.10	61.38	61.22		
		NOx Corr Factor	0.9387	0.9398	0.9392		
	•	Dilution Factor	12,25	18.20	14.31		
	CFV V	/mix (scf @68F)	2796.30	4777.34	2786.95		
		ne A (scf @68F)	7.432	12.773	7.423		
	•	ne B (scf @68F)	7.414	12.775	7.423		
		ie C (scf @68F)	7.407	12.784	7.419		
		ie D (scf @68F)	,	12.107	7.410		
Sam	ple Volume Aver	age (scf @68F)	7.418	12.777	7.420		
		mix (scf @68F)	2818.56	4815.67	2809.21		
		nase Time (sec)	506.70	869.90	506.70		
		Distance (miles)	3.593	3.856	3.589		
	PSU	Probe A (degC)					
	PSU	Probe B (degC)					
		Probe C (degC)					
		Dil Air A (degC)	42.0	41.7	41.7		
	PSU I	Dil Air B (degC)	44.4	43.9	43.8		
	PSU I	Dil Air C (degC)	40.8	40.6	40.5		
	PSU	Filter A (degC)	44.1	45.5	45.6		
		Filter B (degC)	47.2	47.0	45.7		
		Filter C (degC)	44.3	44.8	44.4		
	PSU I	Dil Flow A (Ipm)	29.9	29.9	29.9		
		Oil Flow B (Ipm)	29.9	29.9	29.9		
		Oil Flow C (Ipm)	30.0	29.9	29.8		
		Proportionality		<del></del>			
		Proportionality					
		Proportionality					
•		• •					
101208 - d329	EPAVDAEm110	608074621	n sarra (Manhadha	Page 2 of 2		***	Print Time 08-Jun-2011 13:

To: richard.thomas@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Thur 6/9/2011 2:20:18 PM

Subject: NHTSA footprint measurement procedure attached

NHTSA footprint TP-537-01.pdf

Richard,

Regarding base tires, see page 17, parag G. [I'm not sure what NHTSA does if they can't find a vehicle equipped with the base tires.]

Regards

To: Jim Snyder/AA/USEPA/US@EPA[] Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com] "Rodgers, William" Thur 6/9/2011 7:18:09 PM From: Sent: Subject: Vehicle releases william.rodgers@vw.com Hello Jim, Please release the VW Passat and Audi TTRS test vehicles. We hope to pick them up on Friday (tomorrow) and/or Monday. The Verify results came in today for the TTRS. Thanks, **Bill Rodgers Engineering and Environmental Office** VOLKSWAGEN Group of America, Inc. Rochester Hills, MI **United States** (248) 754-4219 (248) 754-4207

/\_\_\. (o\\_l\_/o)

william.rodgers@vw.com

To: verifyhelp@csc.com[verifyhelp@csc.com]
Cc: Jim Snyder/AA/USEPA/US@EPA[]

From: "Hart, Robert (VWoA)"

Sent: Thur 6/9/2011 8:07:18 PM

**Subject:** Found yet another glitch in the new Verify System release.

<u>LightDutyCertificationDataSubmission.xml</u>

Problem: For diesels the EPA performs two US06 tests (A one bag test as the Confirmatory Test for certification with PM measurement and one as a two bag test for fuel economy without PM measurement.). The PM is needed for the PM Comp calculation and the two bag test is needed for the Litmus Test for fuel economy.

The problem is you get the error message below for the US06 test number entered in the Litmus Test section when the required two bag test (w/o PM measurement) number is entered. PM is not required for the Litmus Test, so this business rule should not apply to the Litmus test entries.

I have submitted Test Group Info xml files with all combinations of the US06 test numbers. I get back either the error message below or the a CSI file with N/A in the Litmus Test fields. Neither is acceptable.

- Submission
- o Document Name: LightDutyCertificationDataSubmission.xml
- o Transaction Id: \_cbff36da-9b4c-46be-970c-380911f2f633
- o Date Originally Submitted: 06/09/2011

Transaction Status Identifier: REJECTED

Transaction Message Text: LD-CERT-TG-BR080b - If the SFTP Compliance Indicator (TG-216.8) is 'Y' (Yes) and there is an exhaust emission standard entered with the emission name (TG-209) of PM-COMP (PM SFTP Composite), then the US06 test number (TG-218) must identify a test that has a PM emission result (TI-19). (Test Number: CVWX91000952 Emission Results Found: [HC-TOTAL, NOX, NMOG, HC-NM+NOX, FE BAG 2, HC-NM, CO2, CO, METHANE, FE BAG 1, MFR FE])

Robert Hart

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: "Giles, Michael (EEO)" [michael.giles@vw.com]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=David Bochenek/OU=AA/O=USEPA/C=US@EPA;CN=David

Vanamburg/OU=AA/O=USEPA/C=US@EPA;CN=Ben

Haynes/OU=AA/O=USEPA/C=US@EPA; CN=John~Spieth/OU=AA/O=USEPA/C=US@EPA[];

N=David Vanamburg/OU=AA/O=USEPA/C=US@EPA;CN=Ben

Haynes/OU=AA/O=USEPA/C=US@EPA;CN=John Spieth/OU=AA/O=USEPA/C=US@EPA[];

N=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;CN=John

Spieth/OU=AA/O=USEPA/C=US@EPA[]; N=John Spieth/OU=AA/O=USEPA/C=US@EPA[]

From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

**Sent:** Wed 9/19/2012 2:47:04 PM **Subject:** Re: VW testing schedule

Hello Mike,

Site 329 is currently not available for any diesel testing, not just particulates as I indicated to your Engineers. Sorry for the confusion. It is likely that VW324 10220/13 will not test today. I'll keep you informed of the status of the site.

361 730 136/13 did test, and is currently in the Hot Soak SHED. Your Engineers asked to let them know if the start - stop function worked properly. I checked with the vehicle tester and it worked properly. We do need the nominal voltage for this vehicle for next week's four bag test.

Again, if you have any questions or concerns, please contact me.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Vincent Mazaitis/AA/USEPA/US@EPA

Cc: Jim Snyder/AA/USEPA/US@EPA, "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 09/17/2012 12:10 PM Subject: VW testing schedule

Hello Vincent,

To follow up from my voice message – would you be able to send a schedule for the testing for our Jetta Hybrid and Beetle TDI? We would like to have 2 or 3 staff there for the start of testing if possible.

Also, we have a new colleague here from Germany, and we would like to request a small tour of your facility (maybe after one of the tests if this works for you).

Please let me know or feel free to call me if you wish to discuss.

Michael Giles

**Certification Specialist** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

To: "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]

Cc: "Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;"Peter,

Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Joel

Dalton/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)"

[juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]

From: CN=DavidA Wright/OU=AA/O=USEPA/C=US

**Sent:** Thur 9/20/2012 1:09:45 PM

Subject: RE: Volkswagen Meeting w/EPA -evap emission testing for future advanced

technology vehicles

Len,

The meeting is still scheduled for 1 pm and Jim and Joel are here today.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

This e-mail and any attachment contain information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorized to read, copy or use this e-mail or any attachment. If you have received this e-mail in error, please destroy it and notify the sender by return mail.

\*

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA, DavidA Wright/AA/USEPA/US@EPA, Joel

Dalton/AA/USEPA/US@EPA

Cc: "Peter, Juergen (EASZ/1)" <juergen.peter@volkswagen.de>, "Schlueter, Hannah (EASZ/1)"

<hannah.schlueter@volkswagen.de>

Date: 09/20/2012 08:56 AM

Subject: RE: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

Hello all:

I have tried to reach Jim and Joel and left messages with each. I would like to verify the status of this meeting scheduled for today. If necessary, we can delay until tomorrow.

Please let me know since I would require about 1 hour+ travel time to Ann Arbor.

Regards,

Len

1

Leonard W. Kata Senior Manager Emission Regulations and Certification Engineering and Environmental Office Volkswagen Group of America, Inc.

Phone: (248) 754-4204 Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, September 17, 2012 10:58 AM

To: Wright.DavidA@epamail.epa.gov; Dalton.Joel@epamail.epa.gov; Kata, Leonard (EEO)

Subject: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

Len there is a slight chance that I won't be back by thursday for this mtg but I will be in Friday. In case there is a change, Dave's number is 214-4467 and Len's number is 248-754-4204.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

To: richard.thomas@vw.com[]

Cc: oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Thur 9/20/2012 5:56:04 PM

Subject: re: 2013 FE Guide - Minors Errors to correct in Verify; correcting them will save my

review time (every time I run the FE Guide query)

VW Group 2013 FEGuide-all rel dates-no-sales-9-17-2012.xlsx

Richard,

Enclosed are the data in EPA's Verify data base as of September 17, 2012.

Please correct the errors in the Indexes which are highlighted in green fill in the first few columns. While these errors are minor and did not hold up posting the data on www.fueleconomy.gov, they will save me a few minutes of my review time each time I run the 2013 FE Guide query (every two weeks or more frequently).

Thanks

To: Jim Snyder/AA/USEPA/US@EPA[] "Schmidt, Oliver (EEO)"

From: Thur 9/20/2012 8:36:03 PM Sent:

Subject: Tentative: RE: Audi Meeting with EPA

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Kata, Leonard (EEO)"

Sent: Thur 9/20/2012 9:51:37 PM

Subject: Accepted: FW: Information Update - Room has changed: RE: Audi Meeting with EPA

winmail.dat

message body.rtf

Jim:

I will confirm a count from our side ASAP.

Thanks,

Len

\_\_\_\_\_

Leonard W. Kata Senior Manager Emission Regulations and Certification Engineering and Environmental Office Volkswagen Group of America, Inc.

Phone: (248) 754-4204 Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

Jim:

I will confirm a count from our side ASAP.

Thanks,

Ex. 7

To: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Giles, Michael (EEO)" Fri 9/21/2012 12:19:36 PM
Subject:	FW: VW Group - Test Update
Hi Jim,	
	w up to my voicemail; Can you provide an update for us this sometime this morning? Please mments to Vince below.
Sent: Thur To: Vincen Cc: Rodge	s, Michael (EEO) sday, September 20, 2012 10:39 AM t Mazaitis (Mazaitis.Vincent@epamail.epa.gov) rs, William W Group - Test Update
Hi Vince,	
	u be able to send us any preliminary results for the Jetta Hybrid test? Also, if you could send us dea of the test plan over the next days it would be great.
Lastly, we	are requesting any update you can provide on the Beetle TDI test situation.
Thanks,	
Mike	
Michael G	iles
Certification	on Specialist
Engineerir	ng and Environmental Office
Volkswage	en Group of America, Inc.
3800 Ham	lin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

To: DavidA Wright/AA/USEPA/US@EPA[] Cc: Jim Snyder/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; illiam Ott/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; hris Nevers/AA/USEPA/US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com] From: "Giles, Michael (EEO)" Sent: Fri 9/21/2012 5:10:37 PM Subject: RE: Request for US06 Drive Trace michael.giles@vw.com mailto:Wright.DavidA@epamail.epa.gov michael.giles@vw.com mailto:Wright.DavidA@epamail.epa.gov image001.gif Hello David,

I understand that you spoke with Len Kata about this yesterday, but just as a follow up:

- · Currently, the labs record only1 hz data.
- $\cdot$  10 hz data logging should be possible for the future. We have communicated the need for 10 hz data to our factories.

Please let us know if there are any other specific requirements related to this issue.

Regards,

Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, September 12, 2012 8:34 AM

To: Giles, Michael (EEO)

Cc: Jim Snyder; William Ott; Chris Nevers Subject: RE: Request for US06 Drive Trace

Mike,

Thank you for your response. I am wondering, if per our original request, if the factory has any 10 hz data, or if the only data available are 1 hz?

EPA may be requesting additional drive trace data from certification tests in the future and will be requesting the data in the format specified by SAEJ2951. Please do not hesitate to contact me if you require additional information or have further questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

"Giles, Michael (EEO)" ---09/05/2012 08:36:55 AM---Hello David, Please find attached the drive trace that the factory provided for this test.

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA
Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 09/05/2012 08:36 AM

Subject: RE: Request for US06 Drive Trace

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Thursday, August 23, 2012 9:09 AM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

This e-mail and any attachment contain information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorized to read, copy or use this e-mail or any attachment. If you have received this e-mail in error, please destroy it and notify the sender by return mail.

"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 08/23/2012 08:05 AM

Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 3:54 PM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

"Copy of US06\_Trace.xlsm" deleted by DavidA Wright/AA/USEPA/US]

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[] CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US From: Sent: Mon 9/24/2012 11:26:47 AM Subject: Re: VW Group - Test Update Hello Mike, I talked with the lab this morning, and for vehicle # 361 730 136/13 (Hybrid), we are awaiting post test processing including QC. I'll forward that data as soon as I receive it. We are awaiting the o.k. for diesel testing for VW324 10220/13. I'll find out more about testing later this morning. If you have any questions or concerns, please contact me. Thanks for your patience Mike. Vince Mazaitis From: "Giles, Michael (EEO)" <michael.giles@vw.com> To: Vincent Mazaitis/AA/USEPA/US@EPA Cc: "Rodgers, William (EEO)" < William.Rodgers@vw.com> 09/20/2012 10:39 AM Date: Subject: VW Group - Test Update Hi Vince, Would you be able to send us any preliminary results for the Jetta Hybrid test? Also, if you could send us an rough idea of the test plan over the next days it would be great. Lastly, we are requesting any update you can provide on the Beetle TDI test situation. Thanks, Mike

"Giles, Michael (EEO)" [michael.giles@vw.com]

"Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=Jim

To:

Cc:

Michael Giles

**Certification Specialist** 

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Vincent Mazaitis/AA/USEPA/US@EPA[]

**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; im Snyder/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA[]; avidA

Wright/AA/USEPA/US@EPA[]
From: "Giles, Michael (EEO)"
Sent: Mon 9/24/2012 12:24:07 PM
Subject: RE: VW Group - Test Update

michael.giles@vw.com William.Rodgers@vw.com

1	n	2	n	VC.	١/	ın	ice.

We would appreciate it if you could forward the results as soon as they are available. Also, we are interested in the planned exhaust testing schedule for this week.

Regards,

Mike

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]

Sent: Monday, September 24, 2012 7:27 AM

To: Giles, Michael (EEO)

Cc: Rodgers, William (EEO); Jim Snyder; DavidA Wright

Subject: Re: VW Group - Test Update

Hello Mike,

I talked with the lab this morning, and for vehicle # 361 730 136/13 (Hybrid), we are awaiting post test processing including QC. I'll forward that data as soon as I receive it.

We are awaiting the o.k. for diesel testing for VW324 10220/13. I'll find out more about testing later this morning.

If you have any questions or concerns, please contact me.

Thanks for your patience Mike.

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Vincent Mazaitis/AA/USEPA/US@EPA Cc: "Rodgers, William (EEO)" <william.rodgers@vw.com></william.rodgers@vw.com>
Date: 09/20/2012 10:39 AM
Subject: VW Group - Test Update
Hi Vince,
Would you be able to send us any preliminary results for the Jetta Hybrid test? Also, if you could send us an rough idea of the test plan over the next days it would be great.
Lastly, we are requesting any update you can provide on the Beetle TDI test situation.
Thanks,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Rodgers, William (EEO)" **Sent:** Mon 9/24/2012 3:11:09 PM

Subject: VW Group - Supplemental Information VID D3UG-DAQ-1

Hello Jim,

We have submitted the Supplemental Information for confirmatory testing of the Audi A8 TDI diesel, VID D3UG-DAQ-1. We are hoping to schedule a delivery date of October 22 with testing on Oct 24th.

Regards,

**Bill Rodgers** 

**Emissions Certification Specialist** 

VOLKSWAGEN GROUP OF AMERICA, INC.

**Engineering and Environmental Office** 

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

To: "Giles, Michael (EEO)" [michael.giles@ww.com] Cc: CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com] From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US Sent: Mon 9/24/2012 6:43:10 PM Subject: RE: VW Group - Test Update 361 730 136-13 9-19-12.pdf michael.giles@vw.com William.Rodgers@vw.com
Hello Mike,
Please find enclosed the FTP and Evap Laboratory Test Results for 361 730 136/13 Config 00.
I'm not sure when the 4bag FTP-Hwy-US06 are scheduled. I'll let you know as soon as I find out.
If you have any questions or concerns, please contact me.
Thanks Mike,
Vince Mazaitis
From: "Giles, Michael (EEO)" <michael.giles@vw.com> To: Vincent Mazaitis/AA/USEPA/US@EPA Cc: "Rodgers, William (EEO)" <william.rodgers@vw.com>, Jim Snyder/AA/USEPA/US@EPA, DavidA Wright/AA/USEPA/US@EPA Date: 09/24/2012 08:31 AM Subject: RE: VW Group - Test Update</william.rodgers@vw.com></michael.giles@vw.com>
Thanks Vince.
We would appreciate it if you could forward the results as soon as they are available. Also, we are interested in the planned exhaust testing schedule for this week.
Regards,
Mike
From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]
1

2

Sent: Monday, September 24, 2012 7:27 AM

Michael Giles

**Certification Specialist** 

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



VWX

**NVFEL Laboratory Test Data** 

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0257-015

Vehicle ID: 361 730 136/13 MFR Name VOLKSWAGEN

Test Information

Test Date: 9/19/2012

Key Start / Hot Soak: 09:55:29 / 09:46 Fuel Container ID: F00023 MFR Codes: 590 Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa

Calculation Method: Gasoline

Pretest Remarks:

Transmission: AUTO Shift Schedule: A09980005 Beginning Odometer: 009437.0 KM

Drive Schedule: ftp3bag Soak Period: 22.5 hours

Baq Date	HC-FID	CO	NOx	CO2	CH4	NonMeth HC
Phase 1	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
Sample	5.411	21.139	1.449	0.792	2.384	75.5
Ambient	3.157	3.287	0.028	0.047	2.022	
Net Concentration	2.441	18.047	1.423	0.748	0.482	1.912
Remark	(e*·					
Phase 2						
Sample	2.751	1.987	0.040	0.308	2.002	
Ambient	2.764	1.150	0.013	0.044	1.989	
Net Concentration	0.051	0.863	0.027	0.265	0.059	-0.014
Remark	cs:					
Phase 3						
Sample	2.820	9.411	0.136	0.655	2.120	
Ambient	2.566	0.532	0.000	0.043	1.971	
Net Concentration	0.380	8.904	0.136	0.615	0.245	0.110
Romark	rot					

Remarks:

Phase 4

Sample Ambient

Net Concentration

Remarks: This test has SHED results. SHED Test Number = 2012-0257-015

<u>Results</u>		<u>HC-FID</u>	<u>co</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	NMHC / NMOG	Vol MPG
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
	Phase 1	0.023	0.345	0.041	224.9	0.005	0.018 / 0.019	39.679
	Phase 2	0.001	0.026	0.001	126.8	0.001	0.000 / 0.000	70.538
	Phase 3	0.004	0.170	0.004	184.2	0.003	0.001 / 0.001	48.510
							(NMOG=1.04xNMHC)	F
90.50 SAN TENED	Weighted	0.00618	0.13201	0.01015	162.940	0.00237	0.0040 / 0.0042	
Fuel Economy	.(	Basoline MPG				Dyno Settings	Dyno #:	D002
~	Phase 1	39.59					Inertia:	3625
	Phase 2	70.38					EPA Set Co A:	7.3499999
	Phase 3	48.40					EPA Set Co B:	0.0141
						4	EPA Set Co C:	0.01545
					<b>4</b> .,	*		
	Weighted	54.69					Emiss-Bench:	D002

	in processor and the second process and the s		NVFEL	Laboratory To	est Data			cvs
		Final Laborate	ory Test Resul	ts- Refer to VER				
10.000		Test Number: 2					: 361 730 136/13	
<u>esults</u>		<u>HC-FID</u>	CO	NOx	CO2	CH4	<u>NMHC</u>	Meth Respons
SHITED STATES		(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	1.098
	Phase 1	0.083	1.239	0.146	806.6	0.019	0.065	
	Phase 2	0.003	0.101	0.005	488.0	0.004	0.000	
	Phase 3	0.013	0.610	0.014	661.9	0.010	0.004	
	7:							
VE PROTES								
	CONTRACTOR OF THE STATE OF THE							
est Conditions			Phase 1	Phase 2	Phase 3	Phase 4		
		rometer (inHg)	29.13	29.15	29.16			
		ll Temp (degF)	75.03	75.22	75.27			
		w Point (degF)	49.39	49.52	49.08			
;	Specific Humid	ity (grains/lbm)	53.75	53.98	53.08			
	N	Ox Corr Factor	0.9092	0.9101	0.9066			
		Dilution Factor	16.860	43.478	20.411			
		mix (scf @68F)	2082.25	3558.99	2078.86			
		,						
	CVS Flow F	late Avg (scfm)	245.40	245.39	245.49			
	_		or and a					
		an Placement: O			a de la se			
		se Time (secs)	509.10	870.20	508.10			
		listance (miles)	3.587	3.848	3.594			
	Bag Analys	sis Time (secs)	76.9	74.1	75.6			
FR Test Resu	lts f	or Procedure 21 I	ederal fuel 2-c	lay exhaust (w/ca	n load)			
N	MFR Number	<u>HC</u>	<u>co</u>	<u>NOx</u>	<u>CO2</u>	NMOG	NonMeth HC	
	1E+07	0.007	0.178	0.0061	155	0.	0.0046	
	and the second second	to to one of-			g granounce a			
	<u>Odometer</u>	MPG			MFR Lab:	Volkswagen A	G, Dept EASZ/1	
	9082 K	57.2						
	٨	√PG is 4.59 % hiς	gher than EPA	MPG	Dyno:			
					Fuel:	61 Tier 2 Cert (	Gasoline	

EPA FOIA Production 2016-09-01

2012/09/24

## Variable Temperature SHED Report Test: 72 °F - 96 °F for 48 Hours

Test No: 2012-0257-014 Mfr: 00590 VID: 361 730 136/13 Config: 00

Test Purpose

1

VTSHED# - Net Vol

PZ1 - 58.819 m<sup>3</sup>

**Test Procedure** 

23

Cert Flag

Fuel Type

23

61 Tier 2 Cert Test Fue Requester

Jim Snyder

Technician Name

20511

Validators Initials

## DIURNAL AND TOTAL EVAPORATIVE EMISSIONS

Started (D@T) 09/20/2012 @ 05:22 Finished (D@T) 09/22/2012 @ 05:23 Start Temp (°F) 72.00 Test Length (hrs) 48 Day 1 Total (gHC) 0.114642 Diurnal (gHC) 0.115434 Day 2 Total (gHC) 0.115434 Hot\_Soak\_HC\_(g) 0.007948 Day 3 Total (gHC) Total Emissions (gHC) 0 0.123382

## **QUALITY CONTROL CHECKS**

٧	1.	Was the Vehicle Soak-Time greater than or equal to 6?
		The Vehicle Soak-Time was 06:01:41.
$\sqrt{}$	2.	Was the Vehicle Soak-Temperature during the final 6 hours 72 +/-3 °F?
		The largest Vehicle Soak-Temperature deviation during the final 6 hours was 71.82 °F.
$\sqrt{}$	3.	Was the Time-Difference between closing & sealing the SHED 0 +/-5 min?
		The Time-Difference between closing & sealing the SHED was 0.00 min.
$\sqrt{}$	4.	Was the SHED Feedback minus Setpoint Temperature (Underbody) 0 +/-3 °F?
James and San		The difference was 1.44 °F.
$\sqrt{}$	5.	Was the Average of SHED Feedback minus SHED Setpoint Temperature 0 +/-2 °F?
		The difference was 0.23 °F.
$\sqrt{}$	6.	Was the Average Left & Right Sidewall minus SHED Setpoint Temperature 0 +/-5 °F?
		The difference was 1.49 °F.
√.	7.	Was the Cold-Water-In-Temp greater than or equal to 40 °F?
E-10-10-10-10-10-10-10-10-10-10-10-10-10-		The Minimum Cold-Water-In-Temp was 61.95 °F.
V	8.	Was the Inside versus Outside Differential Pressure 0 +/-2 inH?
		The Differential-Pressure at its largest deviation was 0.40 inH.
$\sqrt{}$	9.	Was the 1-day HC-Value taken at 1440 +/-6 min?
&rommonous e		The 1-day HC-Value was taken at 1440.05 min.
$\sqrt{}$	10	). Was the 2-day HC-Value taken at 2880 +/-6 min?
*usministration of		The 2-day HC-Value was taken at 2880.17 min.

FTP TID: 015 - Hot Soak TID: 015 - VERIFY Status: Unknown

QC Note: All Automated Quality Checks Passed

To: Vincent Mazaitis/AA/USEPA/US@EPA[]

**Cc:** DavidA Wright/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; im Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]

From: "Giles, Michael (EEO)"

Sent: Mon 9/24/2012 7:11:51 PM

Subject: RE: VW Group - Test Update

michael.giles@vw.com
William.Rodgers@vw.com
mailto:Mazaitis.Vincent@epamail.epa.gov
michael.giles@vw.com
William.Rodgers@vw.com

Thanks Vince,

We had indirect word from Ben that preconditioning was to be tomorrow and testing Wednesday. But if you hear anything different please let us know.

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]

Sent: Monday, September 24, 2012 2:43 PM

To: Giles, Michael (EEO)

Cc: DavidA Wright; Jim Snyder; Rodgers, William (EEO)

Subject: RE: VW Group - Test Update

Hello Mike,

Please find enclosed the FTP and Evap Laboratory Test Results for 361 730 136/13 Config 00.

I'm not sure when the 4bag FTP-Hwy-US06 are scheduled. I'll let you know as soon as I find out.

If you have any questions or concerns, please contact me.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Vincent Mazaitis/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" < William.Rodgers@vw.com>, Jim Snyder/AA/USEPA/US@EPA, DavidA

Wright/AA/USEPA/US@EPA
Date: 09/24/2012 08:31 AM

Subject: RE: VW Group - Test Update

Thanks Vince.

We would appreciate it if you could forward the results as soon as they are available. Also, we are interested in the planned exhaust testing schedule for this week.

Regards,

Mike

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]

Sent: Monday, September 24, 2012 7:27 AM

To: Giles, Michael (EEO)

Cc: Rodgers, William (EEO); Jim Snyder; DavidA Wright

Subject: Re: VW Group - Test Update

Hello Mike,

I talked with the lab this morning, and for vehicle # 361 730 136/13 (Hybrid), we are awaiting post test processing including QC. I'll forward that data as soon as I receive it.

We are awaiting the o.k. for diesel testing for VW324 10220/13. I'll find out more about testing later this morning.

If you have any questions or concerns, please contact me.

Thanks for your patience Mike.

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Vincent Mazaitis/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <william.rodgers@vw.com> Date: 09/20/2012 10:39 AM</william.rodgers@vw.com>
Subject: VW Group - Test Update
Hi Vince,
Would you be able to send us any preliminary results for the Jetta Hybrid test? Also, if you could send us an rough idea of the test plan over the next days it would be great.
Lastly, we are requesting any update you can provide on the Beetle TDI test situation.
Thanks,
Mike
WINCE
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"
Sent: Tue 9/25/2012 12:11:59 PM

Subject: VW Testing

Hi Jim,

Just as a heads up, as I mentioned in my voice message this morning, our colleagues (Juergen Peter and Hannah Schlueter) are interested in a quick meeting with you sometime today if you are available for 20 minutes or so. They had suggested 1:00 or 1:30 timeframe. He mentioned that he would like to be here for the Start of Exhaust testing for the Hybrid and also discuss any new information you might have about the Beetle testing.

Michael Giles

**Certification Specialist** 

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

From: "Giles, Michael (EEO)"  Sent: Tue 9/25/2012 2:08:52 PM  Subject: RE: VW Testing
Hì Jim,
I just spoke with Juergen, he is still interested in a quick visit around 1:00. As you suggested, I told him to go to the office side of EPA.
Thanks
Mike
From: Giles, Michael (EEO) Sent: Tuesday, September 25, 2012 8:12 AM To: Jim Snyder (Snyder.Jim@epamail.epa.gov) Subject: VW Testing
Hi Jim,
Just as a heads up, as I mentioned in my voice message this morning, our colleagues (Juergen Peter and Hannah Schlueter) are interested in a quick meeting with you sometime today if you are available for 20 minutes or so. They had suggested 1:00 or 1:30 timeframe. He mentioned that he would like to be here for the Start of Exhaust testing for the Hybrid and also discuss any new information you might have about the Beetle testing.
Michael Giles
Certification Specialist
Engineering and Environmental Office

1

To:

Jim Snyder/AA/USEPA/US@EPA[]

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Vincent Mazaitis/AA/USEPA/US@EPA[] Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]; im Snyder/AA/USEPA/US@EPA[] From: "Giles, Michael (EEO)" Sent: Tue 9/25/2012 2:15:38 PM Subject: VW Schedule - Wednesday
Hi Vince,
Ben told us yesterday that the Jetta Hybrid exhaust tests are scheduled for Wednesday - can you confirm? Also is 7:00 am still the best time to show up?
As a second item, I spoke with Jim who mentioned that there has been progress with the diesel test lab, and that the Beetle might be tested sometime this week. If you could keep us advised of tentative or actual timing as it develops it would be greatly appreciated.
Thanks,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: "Giles, Michael (EEO)" [michael.giles@ww.com]  Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)"  [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  Sent: Tue 9/25/2012 2:55:47 PM  Subject: Re: VW Schedule - Wednesday
Hello Mike,
Just to follow up, We are still slated to test the Jetta Hybrid on Wednesday. Having your people here at 7:00 am is best. If there is a change, I'll call you.
The lab is currently testing the diesel tunnel. Hopefully it will come on line soon. Again, I'll keep you informed as to its status.
Thanks Mike,
Vince Mazaitis
From: "Giles, Michael (EEO)" <michael.giles@vw.com> To: Vincent Mazaitis/AA/USEPA/US@EPA Cc: "Rodgers, William (EEO)" <william.rodgers@vw.com>, Jim Snyder/AA/USEPA/US@EPA Date: 09/25/2012 10:15 AM Subject: VW Schedule - Wednesday</william.rodgers@vw.com></michael.giles@vw.com>
Hi Vince,
Ben told us yesterday that the Jetta Hybrid exhaust tests are scheduled for Wednesday - can you confirm? Also is 7:00 am still the best time to show up?
As a second item, I spoke with Jim who mentioned that there has been progress with the diesel test lab, and that the Beetle might be tested sometime this week. If you could keep us advised of tentative or actual timing as it develops it would be greatly appreciated.
Thanks,
Mike
Michael Giles
1

**Certification Specialist** 

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Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Schmidt, Oliver (EEO)"
Sent: Wed 9/26/2012 11:42:55 PM

Subject: Tentative: Audi Mtg w/ EPA rm 601C

To: DavidA Wright/AA/USEPA/US@EPA[]

Cc: "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Schlueter, Hannah

(EASZ/1)" [hannah.schlueter@volkswagen.de]; im Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"

Sent: Thur 9/27/2012 12:54:34 PM

Subject: VW Group - Friday Beetle Test Visit

michael.giles@vw.com mailto:Wright.DavidA@epamail.epa.gov michael.giles@vw.com

mailto:Wright.DavidA@epamail.epa.gov

image001.gif

	Dav	

I understand you are now our backup for Jim, who will be out beginning Friday.

Our colleagues are planning to be at your lab Friday for the start of testing for the Beetle TDI. Our normal lab visit contact person is Vince Mazaitis. We usually need to be there at 7:00 am to see the tests; are you available at this time in case Vince is still out?

Thanks,

Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, September 12, 2012 8:34 AM

To: Giles, Michael (EEO)

Cc: Jim Snyder; William Ott; Chris Nevers Subject: RE: Request for US06 Drive Trace

Mike,

Thank you for your response. I am wondering, if per our original request, if the factory has any 10 hz data, or if the only data available are 1 hz?

EPA may be requesting additional drive trace data from certification tests in the future and will be requesting the data in the format specified by SAEJ2951. Please do not hesitate to contact me if you require additional information or have further questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

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"Giles, Michael (EEO)" ---09/05/2012 08:36:55 AM---Hello David, Please find attached the drive trace that the factory provided for this test.

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 09/05/2012 08:36 AM

Subject: RE: Request for US06 Drive Trace

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Thursday, August 23, 2012 9:09 AM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

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"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA
Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 08/23/2012 08:05 AM

Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 3:54 PM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

#### Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

"Copy of US06\_Trace.xlsm" deleted by DavidA Wright/AA/USEPA/US]

To: Jim Snyder/AA/USEPA/US@EPA[]

**From:** "Giles, Michael (EEO)" **Sent:** Thur 9/27/2012 2:48:47 PM

**Subject:** VW Group - Hybrid

Hi Jim,

Please do not release the Hybrid yet. There is discussion about requesting a retest. We will let you know.

Michael Giles

**Certification Specialist** 

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

To: "Giles, Michael (EEO)" [michael.giles@vw.com]

Cc: "Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)"

[juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]

From: CN=DavidA Wright/OU=AA/O=USEPA/C=US

**Sent:** Thur 9/27/2012 6:06:37 PM

Subject: Re: VW Group - Friday Beetle Test Visit

michael.giles@vw.com

mailto:Wright.DavidA@epamail.epa.gov

michael.giles@vw.com

mailto:Wright.DavidA@epamail.epa.gov

(embedded image) (embedded image)

Yes I will be in the office tomorrow morning at 7 am. If you cannot reach me when you arrive, you can also ask to see David VanAmburg. Let me know if you have any other questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

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\*

From: "Giles, Michael (EEO)" < michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA

Cc: "Peter, Juergen (EASZ/1)" <juergen.peter@volkswagen.de>, "Schlueter, Hannah (EASZ/1)"

<hannah.schlueter@volkswagen.de>, Jim Snyder/AA/USEPA/US@EPA

Date: 09/27/2012 08:54 AM

Subject: VW Group - Friday Beetle Test Visit

Hello David,

I understand you are now our backup for Jim, who will be out beginning Friday.

Our colleagues are planning to be at your lab Friday for the start of testing for the Beetle TDI. Our normal lab visit contact person is Vince Mazaitis. We usually need to be there at 7:00 am to see the tests; are you available at this time in case Vince is still out?

Thanks,

#### Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, September 12, 2012 8:34 AM

To: Giles, Michael (EEO)

Cc: Jim Snyder; William Ott; Chris Nevers Subject: RE: Request for US06 Drive Trace

Mike,

Thank you for your response. I am wondering, if per our original request, if the factory has any 10 hz data, or if the only data available are 1 hz?

EPA may be requesting additional drive trace data from certification tests in the future and will be requesting the data in the format specified by SAEJ2951. Please do not hesitate to contact me if you require additional information or have further questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

"Giles, Michael (EEO)" ---09/05/2012 08:36:55 AM---Hello David, Please find attached the drive trace that the factory provided for this test.

From: "Giles, Michael (EEO)" <michael.giles@vw.com>
To: DavidA Wright/AA/USEPA/US@EPA

Cc: Jim Snyder/AA/USEPA/US@EPA Date: 09/05/2012 08:36 AM

Subject: RE: Request for US06 Drive Trace

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards, Mike From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Thursday, August 23, 2012 9:09 AM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

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"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 08/23/2012 08:05 AM

Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 3:54 PM

3

To: Giles, Michael (EEO) Cc: Jim Snyder Subject: Request for US06 Drive Trace Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

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"Copy of US06\_Trace.xlsm" deleted by DavidA Wright/AA/USEPA/US]

To: Jim Snyder/AA/USEPA/US@EPA[] From: "Kata, Leonard (EEO)" Sent: Thur 9/27/2012 10:35:10 PM Subject: Volkswagen Alternate Canister Loading Procedure Canister Loading Procedure.pdf
Hello Jim:
Attached is an advance copy of our formal request for approval of the Volkswagen alternate canister loading procedure. This was the subject of our meeting on September 20, 2012. I will also submit at electronic version ASAP.
Thanks again for meeting with us.
Best regards,
Len
Leonard W. Kata
Senior Manager
Emission Regulations and Certification
Engineering and Environmental Office
Volkswagen Group of America, Inc.
Phone: (248) 754-4204
Cell: (248) 797-3886
E-Mail: leonard.kata@vw.com

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder Compliance and Innovation Strategies Division Office of Mobile Sources U. S. Environmental Protection Agency 2000 Traverwood Dr. Ann Arbor, Michigan 48105 Leonard W. Kata Name
Senior Manager Title
EEO Department
248-754-4204 Phone
248-754-4207 Fax
leonard.kata@vw.com E-Mail

September 27, 2012 Date

Subject: Request for Use of Alternative Evaporative Canister Loading Procedure

3800 HAMLIN ROAD AUBURN HILLS, MI 48326 PHONE +1 248 754 5000

VOLKSWAGEN GROUP OF AMERICA, INC.

### Dear Jim:

On September 20, 2012, representatives from Volkswagen AG and Volkswagen Group of America, Inc., met with you and other EPA staff to request the use of an alternate carbon canister loading procedure. The proposed procedure is patterned after the procedure for off-vehicle charge capable hybrid electric vehicles with non-integrated refuelling canister-only systems, as described in the California Evaporative Emission Standards and Test Procedures for 2001 and Subsequent Model Motor Vehicles (amended March 22, 2012).

The request is described in the attached presentation material, which was provided to the agency at the September 20, 2012 meeting. The alternate procedure is intended for use on future model vehicles. This would be limited to conventional and hybrid vehicles that are equipped with non-integrated refueling emission control systems.

Please notify me if further clarification is required. I look forward to your response to this request.

Sincerely,

VOLKSWAGEN GROUP OF AMERICA, INC.

Leonard W. Kata Senior Manager

Engineering and Environmental Office

Enclosure

To: "Giles, Michael (EEO)" [michael.giles@vw.com]

Cc: "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Vincent

Mazaitis/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com];

Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA[]

From: CN=DavidA Wright/OU=AA/O=USEPA/C=US

**Sent:** Mon 10/1/2012 9:35:23 PM

Subject: Re: NVFEL PDF Report Request for Beetle

2012 0240 003.pdf 2012 0240 004.pdf michael.giles@vw.com

mailto:Wright.DavidA@epamail.epa.gov

michael.giles@vw.com

mailto:Wright.DavidA@epamail.epa.gov

michael.giles@vw.com

juergen.peter@volkswagen.de

hannah.schlueter@volkswagen.de

mailto:Wright.DavidA@epamail.epa.gov

michael.giles@vw.com

mailto:Wright.DavidA@epamail.epa.gov

michael.giles@vw.com

mailto:Wright.DavidA@epamail.epa.gov

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(embedded image)

(embedded image)

(embedded image)

The attached files are copies of the FTP (2012\_0240\_004.pdf) and the HWFE (2012\_0240\_003.pdf).

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

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From: "Giles, Michael (EEO)" < michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA

Cc: Vincent Mazaitis/AA/USEPA/US@EPA, "Rodgers, William (EEO)" <William.Rodgers@vw.com>,

"Peter, Juergen (EASZ/1)" < juergen.peter@volkswagen.de>

Date: 10/01/2012 04:48 PM

Subject: NVFEL PDF Report Request for Beetle

Hello David,

We now have VERIFY results for the Beetle. However, it would be very helpful if you could also send us a PDF version of the NVFEL reports, especially for the FTP test which contains bag by bag data for all components.

The test numbers are DVWX91001537 and DVWX91001538.

Thank you for your help, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Monday, October 01, 2012 8:38 AM

To: Giles, Michael (EEO) Cc: Vincent Mazaitis Subject: Re: VW Group

Hi Mike,

We do not release preliminary data, once we have an official result we make sure are informed and able to review the complete results with your staff in Germany. I have a full schedule this afternoon and will be unable to meet with Juergen.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

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"Giles, Michael (EEO)" ---10/01/2012 08:17:15 AM---Hello David, Just a quick note to reiterate our wish to review results for the Beetle as soon as pos

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA Cc: Vincent Mazaitis/AA/USEPA/US@EPA

Date: 10/01/2012 08:17 AM

Subject: VW Group

Hello David,

Just a quick note to reiterate our wish to review results for the Beetle as soon as possible. The results must go back to Germany (+6 hours), hence our eagerness to see data.

Also, Juergen mentioned to me this morning that he was tentatively planning to a quick visit there around noon if you are available. Please keep us posted on status.

Thanks, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Friday, September 28, 2012 1:27 PM

To: Giles, Michael (EEO) Cc: Vincent Mazaitis

Subject: RE: VW Group - Friday Beetle Test Visit

Mike,

The laboratory performs a review of the test and all preconditioning activities to ensure the test is valid before providing certification with any results. We will forward VW copies of the results, as soon as we receive a copy the results, or, are informed that a preliminary summary is available.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

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"Giles, Michael (EEO)" ---09/28/2012 01:00:23 PM---Hello David, Just a follow up to my voice message - we heard already (from Vince) that full results

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA Cc: Vincent Mazaitis/AA/USEPA/US@EPA

Date: 09/28/2012 01:00 PM

Subject: RE: VW Group - Friday Beetle Test Visit

Hello David,

Just a follow up to my voice message - we heard already (from Vince) that full results will not be available for the Beetle TDI test until early next week due to extra measurement time for particulates.

However, if it is possible to obtain any form of early report for partial results such as emissions outcome relative to the standards, or fuel economy values, it would be greatly appreciated.

Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Thursday, September 27, 2012 2:07 PM

To: Giles, Michael (EEO)

Cc: Schlueter, Hannah (EASZ/1); Jim Snyder; Peter, Juergen (EASZ/1)

Subject: Re: VW Group - Friday Beetle Test Visit

Yes I will be in the office tomorrow morning at 7 am. If you cannot reach me when you arrive, you can also ask to see David VanAmburg. Let me know if you have any other questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

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"Giles, Michael (EEO)" ---09/27/2012 08:54:38 AM---Hello David, I understand you are now our backup for Jim, who will be out beginning Friday.

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA

Cc: "Peter, Juergen (EASZ/1)" <juergen.peter@volkswagen.de>, "Schlueter, Hannah (EASZ/1)"

<hannah.schlueter@volkswagen.de>, Jim Snyder/AA/USEPA/US@EPA

Date: 09/27/2012 08:54 AM

Subject: VW Group - Friday Beetle Test Visit

Hello David,

I understand you are now our backup for Jim, who will be out beginning Friday.

Our colleagues are planning to be at your lab Friday for the start of testing for the Beetle TDI. Our normal lab visit contact person is Vince Mazaitis. We usually need to be there at 7:00 am to see the tests; are you available at this time in case Vince is still out?

Thanks, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, September 12, 2012 8:34 AM

To: Giles, Michael (EEO)

Cc: Jim Snyder; William Ott; Chris Nevers Subject: RE: Request for US06 Drive Trace

Mike,

Thank you for your response. I am wondering, if per our original request, if the factory has any 10 hz data, or if the only data available are 1 hz?

EPA may be requesting additional drive trace data from certification tests in the future and will be requesting the data in the format specified by SAEJ2951. Please do not hesitate to contact me if you require additional information or have further questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

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"Giles, Michael (EEO)" ---09/05/2012 08:36:55 AM---Hello David, Please find attached the drive trace that the factory provided for this test.

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA
Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 09/05/2012 08:36 AM

Subject: RE: Request for US06 Drive Trace

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Thursday, August 23, 2012 9:09 AM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

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"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA
Cc: Jim Snyder/AA/USEPA/US@EPA

Date: 08/23/2012 08:05 AM

Subject: RE: Request for US06 Drive Trace

6

#### David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards, Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 3:54 PM

To: Giles, Michael (EEO)

Cc: Jim Snyder

Subject: Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

"Copy of US06\_Trace.xlsm" deleted by DavidA Wright/AA/USEPA/US]

CVS

VWX

**NVFEL Laboratory Test Data** 

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0240-003

Vehicle ID: VW324 10220/13

Test Information

Test Date: 9/28/2012

MFR Name VOLKSWAGEN

Key Start: 09:59:06

MFR Codes: 590

Fuel Container ID: F00022 Fuel Type: 19 Cert Diesel 7-15 ppm Sulfur Config #: 00

Transmission: AUTO

Test Procedure: 03 HWFET (hwfetprep\_hwfet) Calculation Method: Diesel Pretest Remarks:

Shift Schedule: A09980011 Beginning Odometer: 003994.0 MI

Drive Schedule: hwfet\_hwfet

	The second secon					
Bag Data	THC / IntTHC	CO	NOx	CO2	CH4	NonMeth HC
Phase 1	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
Sample	9.488 / 9.604	4.666	0.448	0.950	8.021	
Ambient	3.104	0.215	0.025	0.046	2.147	
Net Concentration	6.605 / 6.721	4.467	0.425	0.908	6.027	0.170

Remarks:

Phase 2

Sample Ambient

**Net Concentration** 

Remarks:

Phase 3

Sample **Ambient** 

Net Concentration

Remarks:

Phase 1

Phase 4

Results

Sample

**Ambient** 

Net Concentration

Remarks: This test has particulate results.

CO

(gpm)

0.062

THC / IntTHC

(gpm)

- / 0.046

						(NMOG=NMHC)	
Fuel Economy		Diesel MPG	Coastdwn secs:	17.51	Dyno Settings	Dyno #:	D329 - FWD
	Phase 1	51.60		17.43	and the same and an arrangement of the same and	Inertia:	3625
				17.31		EPA Set Co A:	8.93
						EPA Set Co B:	0.1494
					<u></u>	EPA Set Co C:	0.02109
			· ·	1	100		
****	***************************************	1000		17.41		Emiss-Bench:	Mexa 7200dle
120518 - d329	EPAVDAEm1209	928093540	Page 1 of 2		PLALISE ALISE RESK	Print Tin	ne 01-Oct-2012 14:4

**NOx** 

(gpm)

0.009

CO2

(gpm)

196.9

NMHC / NMOG

(gpm)

0.001

CH4

(gpm)

0.048

Vol MPG

(mpg)

51.889

		NALETI	_aboratory Te	st Data			cvs
Fina	I Laborato	ry Test Result	s- Refer to VER	FY Reports for C			
		12-0240-003	4		Vehicle ID	: VW324 10220/13	3
esults THC / I		CO	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	Meth Respor
(grai		(grams)	(grams)	(grams)	(grams)	(grams)	1.087
Phase 1 - / 0	.470	0.631	0.089	2016.1	0.488	0.012	
				in the	,		
est Conditions	201 2707H2 T	Phase 1	Phase 2	Phase 3	Phase 4		
Baromete		29.23					
Avg Cell Temp		72.25					
Dew Point		48.41					
Specific Humidity (grai	ns/lbm)	51.63					
NOx Con		0.9010					
CO2 Dilution		14.078					
CFV Vmix (scf		4249.39		· · · · · · · · · · · · · · · · · · ·			
Total Vmix (sc	f@68F)	4285.26					
edebysa video eta 1	45 4 4						
CVS Flow Rate Avg	(scfm)	333.24					
Fan Plac	rement: On	e Fan - Up - Fr	ont				
Phase Time	o (secs)	765.10	on.				
Distance		10.237					
Bag Analysis Time		10.207					
	/(0000)						
FR Test Results for Proce	edure 3 HW	'FE					
				1.4.3	14424		
MFR Number HC	•	<u>co</u>	<u>NOx</u>	<u>CO2</u>	NMOG	NonMeth HC	

MPG is 0.57 % higher than EPA MPG

Dyno: 21 Fuel: 19 Cert Diesel 7-15 ppm Sulfur

Page 2 of 2

10/1/2012 2:40 PM

20080609183200

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## **NVFEL Laboratory Test Data**

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0240-003

Vehicle ID: VW324 10220/13 MFR Name VOLKSWAGEN

**PARTICULATE** 

VWX

Test Information

Test Date: 9/28/2012 Key Start: 09:59:06

Fuel Container ID: F00022

Fuel Type: 19 Cert Diesel 7-15 ppm Sulfur

Calculation Method: Diesel Pretest Remarks:

Test Procedure: 03 HWFET (hwfetprep\_hwfet)

Transmission: AUTO Shift Schedule: A09980011 Beginning Odometer: 003994.0 MI Drive Schedule: bwfet bwfet

MFR Codes: 590

Config #: 00

		Pretest Remark	KS:			Drive Schedule:	hwfet_hwfet	
							All filter weights are co	WINDOWS AND THE CONSTRUCTION OF THE PROPERTY O
<u>articulate</u> hase 1	<u>Filter</u> Sampler	<u>Filter</u> No.	<u>Tare</u> (Pre Wt)	<u>Gross</u> (Post Wt)	Net Wt mg	<u>Total Mass</u> mg	<u>Total Mass</u> mg / mi	<u>Filter</u> comment
·		B 4451 C 4451		146.3624 146.1505	0.01570 0.02691	3.752 6.428	0.367 0.628	
	Remarks:					Exclude A	<b>*</b>	¥
hase 2								
hase 3	Remarks:					ari	:	¥
	Remarks:					a de la companya de l	a sa	÷
hase 4								
	Remarks:	This test has	particulate results.			¥	ri,	¥
verage Ro	esults Phase	1		,	Net Wt mg 0.02131	Total Mass mg 5.090	Total Mass mg / mi 0.497	
			All filter weights are co	rrected for buoyancy.				
	Filter Stabilit Net or 0.01 n 0.0	ng No.	<u>Tare</u> (Pre Wt) 144.67750 143.30737	Gross (Post Wt) 144.67818 143.30775	Net Wt mg 0.00068 0.00039	Stability Check PASS/FAIL PASS PASS	Dyno #: Inertia: EPA Set Co A: EPA Set Co B: EPA Set Co C:	8.93 0.1494
							Emissions Bencl	Mexa 7200dle

10/1/2012 2:40 PM

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20080609183200

Page 1 of 2

VTAURdxxx.xls

Print Time 01-Oct-2012 14:40

				L Laboratory Te			PARTICULAT
		Final Laborat Test Number: 2	: VW324 10220/13				
VEIGHING	CHAMBER	Buoyancy	Operator	Chamber Temp	Dew Point	Barometer	_Last Change in Status
	Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp
re-test	9/27/12 10:20	1.0011189	022298	72.9	49.5	29.28	NORM @ 09/27/12 00:11:40
ost-test	9/28/12 14:11	1.0011174	022298	71.8	49.3	29.18	NORM @ 09/27/12 21:49:31
						i kosta - paijkoa:	
st Cond	itions		Phase 1	Phase 2	Phase 3	Phase 4	
		Barometer (inHg)	29.23	1.114401	11111300	111030 7	
		ell Temp (degF)	72.25				
		ew Point (degF)	48.41				
		dity (grains/lbm)	51.63				
		NOx Corr Factor	100000000000000000000000000000000000000				
			0.9010				
	OEVA.	Dilution Factor	14.08				
		/mix (scf @68F)	4249.39				
		ne A (scf @68F)	47.000				T
		ne B (scf @68F)	17.929				
		ne C (scf @68F)	17.941				
		ne D (scf @68F)	استعامت بيرين	Λ.			
Sar	nple Volume Ave		11.957				
		/mix (scf @68F)	4285.26				
		hase Time (sec)	765.10				
		Distance (miles)	10.237				
	neu	Probe A (degC)					
		Probe B (degC)					
		Probe C (degC)	40.0				
		Dil Air A (degC)	43.9				
		Dil Air B (degC)	40.6				
		Dil Air C (degC)	38.5				
		J Filter A (degC)	48.2				
		J Filter B (degC)	45.7				
		J Filter C (degC)	49.3				
		Dil Flow A (Ipm)	0.0				
		Dil Flow B (lpm)	15.0				
		Dil Flow C (Ipm)	14.8				
		A Proportionality					
		3 Proportionality					
	PSU (	C Proportionality					
120518 - d32	9 EPAVDAEm12	0928093540		Page 2 of 2			Print Time 01-Oct-2012 1

		Einal Labor		Laboratory T		s for Official Data		cvs
			2012-0240-004	is- neier to ver	ur i neports		VW324 10220/1	3
est Information		Test Date: tart / Hot Soak: el Container ID:	08:28:53 / 09:44			THE RESIDENCE OF THE PROPERTY	VOLKSWAGEN 590	
AL MOTEUR	T Calc		19 Cert Diesel 7 2	-15 ppm Sulfur		Transmission: Shift Schedule: Beginning Odometer: Drive Schedule:	AUTO A09980005 003983.0 MI	
	·					Soak Period:	22.1 hours	
Bag Data		THC / IntTHC	CO	NOx	CO2	CH4	NonMeth HC	***************************************
<u>Phase 1</u> Sample		(ppmC) 28.329 / 28.952	(ppm) 35.639	(ppm) 13.351	(%) 0.820	(ppm) 18.685	(ppmC)	
Ambient Net Concentration		2.484 25.997 / 26.620	0.854 34.838	0.104 13.253	0.050 0.773	2.408 16.425	8.766	
	Remarks:							
<u>Phase 2</u>		0.007/0.07	A 100 A	ag danasa.	Specific Control	e maa		
Sample Ambient		6.237 / 6.275 2.507	0.584 0.339	1.111 0.080	0.470 0.050	5.706 2.443		
Net Concentration		3.817 / 3.855	0.257	1.034	0.422	3.349	0.215	
e the street	Remarks:							
<u>'hase 3</u> Sample		6.640 / 6.769	0.644	0.239	0.649	6.123		
Ambient		2.490	0.294	0.239	0.049	2.430		
Net Concentration		4.270 / 4.400	0.365	0.174	0.603	3.812	0.257	
	Remarks:							
<u>Phase 4</u>								
Sample Ambient								
Net Concentration								
	Remarke:	This test has pa	ticulata raculte					
lesults		THC / IntTHC	<u>,co</u> (	NOx	<u>002</u>	<u>CH4</u>	NMHC / NMOG	
	Phase 1	(gpm) - / 0.348	(gpm)	(gpm)	(gpm)		(gpm) 0.114	(mpg) 31.702
	Phase 1 Phase 2	- / 0.348 - / 0.080	0.919 0.011	0.530 0.066	320.2 278.4		0.114	36.712
	Phase 3	- / 0.057	0.010	0.007	248.3	0.057	0.003	41.178
	e Mercielani Pirine	0.40000		A 2 4 m m m	د د د د د د د د د د د د د د د د د د د	n missionis	(NMOG=NMHC)	
iial Economy	Weighted	0.12933 Diocal MPG	0.19883	0.14598	278.819	9 0.10891 Dyno Settings	0.02699	D329 - FWD
uel Economy	Phase 1	Diesel MPG 31.53				DAIIO Semilos	Dyno #. Inertia:	
	Phase 2	36.51					EPA Set Co A:	
	Phase 3	40.95					EPA Set Co B:	
						. <b>A</b>	EPA Set Co C:	0.02109
	Weighted	36.38	* 	***		•	Emiss-Bench:	Mexa 7200dle
/120518 - d329EI	PAVDAEm120	928080610		Page 1 of 5			Print Tir	ne 01-Oct-2012 14

			NVFFI	Laboratory To	est Data			cvs
		Final Laborate			IFY Reports for	Official Data		~ * •
		Test Number: 2			The state of the s		: VW324 10220/13	
esults		THC / IntTHC	<u>CO</u>	NOx	COS	CH4	NMHC	Meth Resp
20160 ST42		(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	1.087
	\ Phase 1	- / 1.247	3.294	1.901	1148.1	0.890	0.410	
	Phase 2					and the second s		
		- / 0.308	0.042	0.253	1070.5	0.310	0.017	
	Phase 3	- / 0.205	0.034	0.025	890.4	0.205	0.012	
	/							
XX PROSS/		1						
			v - 1					
est Condition	2		Phase 1	Phase 2	Phase 3	Phase 4		
	В	larometer (inHg)	29.22	29.22	29.22			
	Avg C	ell Temp (degF)	72.40	72.35	72.48			
		ew Point (degF)	51.08	51.21	51.46			
		dity (grains/lbm)	57.12	57.39	57.93			
		NOx Corr Factor	0.9225	0.9236	0.9257			
	CO	2 Dilution Factor	16.222	28.461	20.609			
	CFV V	/mix (scf @68F)	2853.41	4871.63	2836.17			
	rotal	Vmix (scf@68F)	2867.56	4895.11	2849.92			
	CVS Flow I	Rate Avg (scfm)	336.62	335.63	335.77			
		Fan Placement: O	ne Fan - Up - F	Front				
	Ph	ase Time (secs)	508.60	870.90	506.80			
		Distance (miles)	3.586	3.844	3.586			
	bag Analy	ysis Time (secs)	1004.5	248.6	135.8			
						(1)		
IFR Test Resu	its	for Procedure 2 C	VS 75 and late	r (w/o can. load)				
	Andrews and the second			<ul> <li>One of the control of t</li></ul>				
<u> </u>	MFR Number	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	NonMeth HC	
	1E+07	0.0983	0.17	0.018	283	0	0.0038	
	Odometer	MPG P	M		MFR Lab:	Volkswagen AC	6, Dept EASZ/1	
	3739 M	35.9	0.001					
		MPG is -1.31 % lo	4.00		Dyno:	21		
		WII CO 10 - 1.01 70 IC	wei uidli EFA	WIF G				
					ruel:	19 Cett Diesel	7-15 ppm Sulfur	

v120518 - d329\_\_\_\_EPAVDAEm120928080610

Page 2 of 5

Print Time 01-Oct-2012 14:41

	ULATE	PARTIC		***************************************		Laboratory 1					
Test Information				s for Off	IFY Reports	ts- Refer to VE					
Key Start										***	7
Test Procedure: 2   Sampler   Calculation Method: Diese    Diese    Drive Schedule: ftp3bag   Soak Period: 22.1 hours	e C	o vw:	MFR Codes:				08:28:53 / 09:44	Key Start:	1		
Pretest Remarks:   Drive Schedule: ftp3bag   Soak Period: 22.1 hours		9980005	hift Schedule:	Sh		-15 ppm Sulfur	2	rocedure:	Test P	7	N/V
All filter weights are corrected   Particulate   Filter   Filter		3bag	rive Schedule:	Dri	4 4		Diesel				
Particulate   Filter   Filte	for buoyar							***************************************	*****************		***************************************
Sampler   No.   (Pre Wt)   (Post Wt)   mg   mg   mg   mg   mg   mi   co	Filter		CHARLES CONTRACTOR CON	t	Net Wi	Gross	Tare	Filter		Filter	articulate
Remarks:   Exclude A	omment	A CONTRACTOR OF THE PARTY OF TH					Name of Contract o				hase 1
B		190,000,000									
B			and the second								
B	•	<b>*</b> *	Exclude A							Hemarks:	ar thoron to ass
Remarks:   Exclude A   Exclu		0.460	1 903	А	0.0056	144 0251	144 0105	445191	В		nase 2
### B		10.0									
B	r.	k.	Exclude A							Remarks:	
B											hase 3
Remarks:   This test has particulate results.   Net Wt   Total Mass   mg   mg   mg / mi   mg /							26.000 000 000 000 000	900 CONT. 2000			
Remarks:   This test has particulate results.   Net Wt   Total Mass   mg   mg   mg / mi   mg / mi   mg   mg / mi   mg / mg / mg / mi   mg / mg / mi   mg / mg			and the second							Buring to the	
Remarks: This test has particulate results.   Net Wt	*	*	Exclude A							Hemarks:	a a dittor
Net Wt   Total Mass   Total Mass   mg   mg   mg   mg   mg   mg   mg											nase 4
Net Wt   Total Mass   Total Mass   mg   mg   mg   mg   mg   mg   mg											
Net Wt   Total Mass   Total Mass   mg   mg   mg   mg   mg   mg   mg	•	**	**				culate results	est has nar	This te	Remarks:	
March   Marc		Total Mass	Total Mass		Nativa						
Phase 1   0.00980   3.134   0.874     Phase 2   0.00850   2.723   0.708     Phase 3   0.00844   2.698   0.752     All filter weights are corrected for buoyancy.    Weighted All Filters:   0.75475				٠.	and an additional and a second						rerege n
Phase 2         0.00850         2.723         0.708           Phase 3         0.00844         2.698         0.752    All filter weights are corrected for buoyancy.  Weighted All Filters:  ### Output  ### O				0					se 1	Phas	
All filter weights are corrected for buoyancy.  Weighted All Filters:  O.75475  eference Filter Stability Check Tare Gross Net Wt Stability Check Dyno #: D329 2% of Avg Net or 0.01 mg No. (Pre Wt) (Post Wt) mg PASS/FAIL Inertia: 3625		0.708	2.723	0	0.00850						
Weighted All Filters:         0.75475           eference Filter Stability Check         Tare         Gross         Net Wt         Stability Check         Dyno #: D329           2% of Avg Net or 0.01 mg         No.         (Pre Wt)         (Post Wt)         mg         PASS/FAIL         Inertia: 3625		0.752	2.698	4	0.00844				se 3	Phas	
eference Filter Stability Check         Tare         Gross         Net Wt         Stability Check         Dyno #: D329           2% of Avg Net or 0.01 mg         No.         (Pre Wt)         (Post Wt)         mg         PASS/FAIL         Inertia: 3625					•	orrected for buoyand	All filter weights are co	4			
2% of Avg Net or 0.01 mg No. (Pre Wt) (Post Wt) mg PASS/FAIL Inertia: 3625		0.75475							Filters:	Weighted All	
어떤 이 이 이 보는 이 이 이 이 이 이 이 이 이 이 이 이 이 이 이											
U.U1 I 144.67/50 144.67884 U.00134 PASS EPA Set Co A: 8.93											2% of Av
2 143.30737 143.30760 0.00024 PASS EPA Set Co B: 0.149	M								J.U1		
EPA Set Co C: 0.021			LVOS	•	0.00024	143.30760	190.00/0/	€.			
Emissions Bencl Mexa   120518 - d329EPAVDAEm120928080610			<u> </u>			Page 2 of 5	minimum	10810	Fm12002ener	g EDAVOA	120518 - 42

				L Laboratory Te	PARTICULATI		
				ults- Refer to VERII			
WELOLINIA		Test Number: 2				TO THE RESIDENCE OF THE PERSON	: VW324 10220/13
WEIGHING	CHAMBER	Buoyancy	<u>Operator</u>	Chamber Temp	Dew Point	Barometer	Last Change in Status
متاسم سند	Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp
<u>re-test</u>	9/27/12 10:20	1.0011189	022298	72.9	49.5	29.28	NORM @ 09/27/12 00:11:40
ost-test	9/28/12 10:18	1.0011205	022298	71.1	49.6	29.22	NORM @ 09/27/12 21:49:31
est Cond			Dt				
est Conu			Phase 1	Phase 2	Phase 3	Phase 4	
		Barometer (inHg)	29.22	29.22	29.22		
		ell Temp (degF)	72.40	72.35	72.48		
		ew Point (degF)	51.08	51.21	51.46		
		idity (grains/lbm)	57.12	57.39	57.93		
	ı	NOx Corr Factor	0.9225	0.9236	0.9257		
	د د د ماسد پاس	Dilution Factor	16.22	28.46	20.61		
		/mix (scf @68F)	2853.41	4871.63	2836.17		
		ne A (scf @68F)	-3.769	-7.093	-4.082		
		ne B (scf @68F)	8.979	15.327	8.942		
	The state of the s	ne C (scf @68F)	8.947	15.249	8.886		
		ne D (scf @68F)					
Sar	nple Volume Ave		4.719	7.828	4.582		
	Total \	/mix (scf @68F)	2867.56	4895.11	2849.92		
	P	hase Time (sec)	508.60	870.90	506.80		
		Distance (miles)	3.586	3.844	3.586		
	PSU	Probe A (degC)					
		Probe B (degC)					
	PSU	Probe C (degC)					
		Dil Air A (degC)	35.6	34.2	37.8		
	PSU	Dil Air B (degC)	41.6	41.3	41.9		
		Dil Air C (degC)	39.1	38.1	39.5		
		J Filter A (degC)	48.2	49.8	49.4		
		J Filter B (degC)	50.9	53.6	49.8		
		J Filter C (degC)	48.8	51.1	50.8		
		Dil Flow A (Ipm)	15.0	15.0	15.0		
		Dil Flow B (Ipm)	15.0	15.0	15.0		
	2000	Dil Flow C (lpm)	15.0	15.0	15.1		
		A Proportionality		1.76° 8° 56°.	# 3000 A 18		
		B Proportionality					
		C Proportionality					
							6
						The state of the s	
120518 - d3	9EPAVDAEm12	0928080610		Page 4 of 5			Print Time 01-Oct-2012 1

To: DavidA Wright/AA/USEPA/US@EPA[] Cc: "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; im Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; incent Mazaitis/AA/USEPA/US@EPA[] From: "Giles, Michael (EEO)" Sent: Tue 10/2/2012 5:10:22 PM Subject: VW Group - Request for Release of Beetle					
Hello David,					
This note is in regards to the Beetle TDI vehicle (vehicle ID VW324 10220/13) which recently underwent confirmatory tests (FTP, Hwy) at EPA. We request release of the vehicle for evaluation and possible repair.					
Prior to delivery to EPA, and due to a technical error, several gallons of gasoline (not diesel fuel) were added to the fuel tank, and the vehicle was subsequently driven. The mistake was recognized when the vehicle failed to re-start. After this incident, an attempt to correct the issue was made. At the time the vehicle was delivered, there was a brief discussion about this incident with Ben Haynes. To summarize, VW informed Ben of the incident and requested a discussion if there were problems during OBD checks prior to test.					
Volkswagen is concerned that this mis-fueling incident may have caused damage to the test vehicle immediately prior to the test which, despite our attempts at recovery, could have negatively impacted the emissions results. We are therefore planning to evaluate the vehicle at our facility. If damage is found, we would like to repair the vehicle to the correct certification condition. Following this outcome, we would request that the vehicle be re-tested once repaired.					
Please let us know if you have any concerns about the above steps.					
Regards,					
Mike					
Michael Giles					
Certification Specialist					
Engineering and Environmental Office					

1

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

To: "Giles, Michael (EEO)" [michael.giles@w.com]

Cc: CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]

From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

**Sent:** Tue 10/2/2012 5:33:55 PM

Subject: Re: VW Group - Request for Release of Beetle

Hello Mike,

I've released the vehicle as Ben indicated.

I hope it's a minor "fix."

Thanks,

Vince Mazaitis

From: "Giles, Michael (EEO)" < michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA

Cc: "Kata, Leonard (EEO)" < Leonard.Kata@vw.com>, Jim Snyder/AA/USEPA/US@EPA, "Rodgers,

William (EEO)" <William.Rodgers@vw.com>, Vincent Mazaitis/AA/USEPA/US@EPA

Date: 10/02/2012 01:10 PM

Subject: VW Group - Request for Release of Beetle

Hello David,

This note is in regards to the Beetle TDI vehicle (vehicle ID VW324 10220/13) which recently underwent confirmatory tests (FTP, Hwy) at EPA. We request release of the vehicle for evaluation and possible repair.

Prior to delivery to EPA, and due to a technical error, several gallons of gasoline (not diesel fuel) were added to the fuel tank, and the vehicle was subsequently driven. The mistake was recognized when the vehicle failed to re-start. After this incident, an attempt to correct the issue was made. At the time the vehicle was delivered, there was a brief discussion about this incident with Ben Haynes. To summarize, VW informed Ben of the incident and requested a discussion if there were problems during OBD checks prior to test.

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we would like to repair the vehicle to the correct certification condition. request that the vehicle be re-tested once repaired.	Following this outcome, we would
Please let us know if you have any concerns about the above steps.	
Regards,	
Mike	
Michael Giles	
Certification Specialist	
Engineering and Environmental Office	
Volkswagen Group of America, Inc.	
3800 Hamlin Road	
Auburn Hills, MI 48326	
United States of America	
Phone +1-248-754-4229	
FAX +1-248-754-4207	

To: "Giles, Michael (EEO)" [michael.giles@vw.com]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; N=Vincent

Mazaitis/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com];

Rodgers, William (EEO)" [William.Rodgers@vw.com]

From: CN=DavidA Wright/OU=AA/O=USEPA/C=US

**Sent:** Tue 10/2/2012 5:42:22 PM

Subject: Re: VW Group - Request for Release of Beetle

I have no concerns with the steps you have described. I look forward to hearing what you learn once you have completed your diagnostics.

### Regards,

David A. Wright
U.S. EPA - OTAQ
Compliance Division, Light-Duty Vehicle Center
2565 Plymouth Road
Ann Arbor, Michigan 48105
734 214-4467
e-mail:wright.davida@epa.gov

\*

This e-mail and any attachment contain information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorized to read, copy or use this e-mail or any attachment. If you have received this e-mail in error, please destroy it and notify the sender by return mail.

From: "Giles, Michael (EEO)" < michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA

Cc: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>, Jim Snyder/AA/USEPA/US@EPA, "Rodgers,

William (EEO)" <William.Rodgers@vw.com>, Vincent Mazaitis/AA/USEPA/US@EPA

Date: 10/02/2012 01:10 PM

Subject: VW Group - Request for Release of Beetle

### Hello David,

This note is in regards to the Beetle TDI vehicle (vehicle ID VW324 10220/13) which recently underwent confirmatory tests (FTP, Hwy) at EPA. We request release of the vehicle for evaluation and possible repair.

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Volkswagen is concerned that this mis-fueling incident may have caused damage to the test vehicle immediately prior to the test which, despite our attempts at recovery, could have negatively impacted the emissions results. We are therefore planning to evaluate the vehicle at our facility. If damage is found, we would like to repair the vehicle to the correct certification condition. Following this outcome, we would request that the vehicle be retested once repaired.

Please let us know if you have any concerns about the above steps.

Regards, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: richard.thomas@vw.com[]

Cc: oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Thur 10/4/2012 3:53:59 PM

Subject: re: 2013 FE Guide - Errors in EPA's data base as of Oct 1, 2012 which held up posting

on www.fueleconomy.gov

VW Group 2013 FEGuide-all-rel dates-no-sales 10-1-2012.xlsx

Richard,

Attached are the data in Verify as of Oct 1, 2012. Labels with pea green fill in the first few columns were not sent to DOE on Oct 3, 2012 for posting on the web. The next normal posting will be October 15, 2012.

Please make any needed corrections as soon as possible.

Thanks

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]

From: "Giles, Michael (EEO)"

**Sent:** Wed 10/10/2012 10:59:42 AM

Subject: VW Group - Decision Info submitted V10 R8

Hello Jim,

We have recently submitted decision information datasets for 2 new (FEDV) configurations for Audi MY 2013 test group DADXV05.2LR8:

Vehicle /	configuration	Models	Type

DAV-558 / 0 R8 Spyder FEDV

DAV-558 / 1 R8 Coupe FEDV

These vehicles have a new 7 speed automatic transmission which will represent SOP for these models (the R8's are currently certified in this test group with a 6 speed transmission as the worst case vehicle).

We are also submitting a running change letter for the new transmission.

Note, there is no change for the existing worst case tests since they represent the Lamborghini models.

Please let me know if you have questions.

Michael Giles

**Certification Specialist** 

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]; avidA

Wright/AA/USEPA/US@EPA[]
From: "Giles, Michael (EEO)"
Sent: Thur 10/11/2012 5:28:15 PM

Subject: RE: VW Group - Decision Info submitted V10 R8

Hello Jim / David,

A correction has been made for to both the running change and decision request for the R8 Spyder. The R8 Spyder with the new automatic 7 speed transmission will be the new worst case vehicle for this test group after all.

Vehicle / configuration Models Type

DAV-558 / 0 R8 Spyder FEDV EDV

DAV-558 / 1 R8 Coupe FEDV

From: Giles, Michael (EEO)

Sent: Wednesday, October 10, 2012 7:00 AM To: Jim Snyder (Snyder.Jim@epamail.epa.gov)

Cc: Rodgers, William

Subject: VW Group - Decision Info submitted V10 R8

Hello Jim,

We have recently submitted decision information datasets for 2 new (FEDV) configurations for Audi MY 2013 test group DADXV05.2LR8:

Vehicle / configuration Models Type

DAV-558 / 0 R8 Spyder FEDV EDV

DAV-558 / 1 R8 Coupe FEDV

These vehicles have a new 7 speed automatic transmission which will represent SOP for these models (the R8's are currently certified in this test group with a 6 speed transmission as the worst case vehicle).

We are also submitting a running change letter for the new transmission.

Note, there is no change for the existing worst case tests since they represent the Lamborghini models.

Please let me know if you have questions.

Michael Giles

**Certification Specialist** 

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

To: Jim Snyder/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;Vincent

Mazaitis/AA/USEPA/US@EPA[]; avidA Wright/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]

Cc: "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]

From: "Giles, Michael (EEO)"
Sent: Mon 10/15/2012 5:02:24 PM

Subject: VW Group - HJetta Hybrid Release requested

Hello Jim, David and Vince,

Just to follow up on voice messages that Richard and I have left - We are requesting that the Jetta Hybrid be released.

We would like to try and pick it up this afternoon if possible. Please let us know the outcome at your earliest convenience.

Thanks, Mike

Michael Giles

**Certification Specialist** 

**Engineering and Environmental Office** 

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

To: "Rhodes, Brian (EEO)" [Brian.Rhodes@vw.com] Cc: "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; im Snyder/AA/USEPA/US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de] "Giles, Michael (EEO)" From: Mon 10/15/2012 7:48:18 PM Sent: Subject: RE: VW Group - Jetta Hybrid Release requested Snyder.Jim@epamail.epa.gov Wright.DavidA@epamail.epa.gov Mazaitis.Vincent@epamail.epa.gov Richard.Thomas@vw.com Hello Brian, I talked to Jim Snyder and he is in the process of releasing the Jetta Hybrid. As we discussed, please pick it up tomorrow. Hello Juergen: I will send you the connector from the vehicle tomorrow by Fedex. Please let me know if you need 24 hour delivery. Regards, Mike From: Giles, Michael (EEO) Sent: Monday, October 15, 2012 1:03 PM To: Rhodes, Brian (EEO) Cc: Thomas, Richard (EEO) (Richard.Thomas@vw.com) Subject: FW: VW Group - HJetta Hybrid Release requested Brian -

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We will let you know when we get the ok.

From: Giles, Michael (EEO) Sent: Monday, October 15, 2012 1:02 PM To: Jim Snyder (Snyder.Jim@epamail.epa.gov); DavidA Wright (Wright.DavidA@epamail.epa.gov); Vincent Mazaitis (Mazaitis. Vincent@epamail.epa.gov) Cc: Thomas, Richard (EEO) (Richard.Thomas@vw.com) Subject: VW Group - HJetta Hybrid Release requested Hello Jim, David and Vince, Just to follow up on voice messages that Richard and I have left - We are requesting that the Jetta Hybrid be released. We would like to try and pick it up this afternoon if possible. Please let us know the outcome at your earliest convenience. Thanks, Mike Michael Giles **Certification Specialist** Engineering and Environmental Office Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326 United States of America

Phone +1-248-754-4229

To: Jim Snyder/AA/USEPA/US@EPA[]
Cc: "Rodgers, William (EEO)" [William.f

Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Kata, Leonard (EEO)"

[Leonard.Kata@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]

From: "Giles, Michael (EEO)"
Sent: Tue 10/16/2012 5:40:13 PM

Subject: Beetle

Hi Jim,

Thanks for the feedback earlier about the Beetle. I passed along your comments that it might be possible to use another vehicle if need be.

I'll let you know what the plan is when it becomes known.

Thanks again,

Mike

Michael Giles

**Certification Specialist** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

To: richard.thomas@vw.com[]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com[];

liver.schmidt@vw.com[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Tue 10/16/2012 8:38:05 PM

Subject: re: 2013 FE Guide - Errors in EPA's data base as of Oct 15, 2012 which held up

posting on www.fueleconomy.gov

VW Group 2013 FEGuide1-all-rel dates-no-sales 10-15-2012.xlsx

Richard,

Attached are the data in Verify as of Oct 15, 2012. Labels with pea green fill in the first few columns were not sent to DOE on Oct 16, 2012 for posting on the web. The next normal posting will be November 1, 2012.

Please make any needed corrections as soon as possible.

Thanks

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"
Sent: Fri 10/19/2012 11:43:06 AM

Subject: FW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Testinfo D3UG DAQ.pdf

Vehicle Prep for EPA D3UG-DAQ.pdf

carsten.stang@audi.de

www.audi.com

carsten.stang@audi.de

www.audi.com

Hi Jim,

As a follow up to your request yesterday, please advise if you need additional information for the stop/start instructions (please see the vehicle prep pdf file).

From: Stang, Carsten (N/EA-521)

Sent: Friday, October 19, 2012 5:19 AM

To: Giles, Michael (EEO)

Cc: Rodgers, William (EEO); Schuetze, Michael (N/EA-521)

Subject: AW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Hi Mike,

Please find attached the test information and vehicle preparation instructions that I prepared for the confirmatory testing of the D4 TDI:

The vehicle preparation instructions are more or less the same that we provided with the D4 4.0T in May. As we had no trouble back then these information should be sufficient this time, too.

Please call me in case you have any comments or ideas to improve the instructions.

Thanks and regards, Carsten

Mit freundlichen Grüßen Best regards

Carsten Stang Aggregatezulassung Neckarsulm Emission Certification

AUDI AG N/EA-521 D-74148 Neckarsulm Tel.: +49-7132-31-4009

Mobil (BIK): +49-7132-31-742417

carsten.stang@audi.de

www.audi.com

Sitz/Domicile: Ingolstadt

Registergericht/Court of Registry: Amtsgericht Ingolstadt

HRB Nr./Commercial Register No.: 1

Vorsitzender des Aufsichtsrats/Chairman of the Supervisory Board: Martin Winterkorn

Vorstand/Board of Management: Rupert Stadler (Vorsitzender/Chairman), Luca de Meo, Frank Dreves, Wolfgang

Dürheimer, Bernd Martens, Thomas Sigi, Axel Strotbek

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Von: Giles, Michael (EEO)

Gesendet: Donnerstag, 18. Oktober 2012 22:31

An: Stang, Carsten (N/EA-521) Cc: Rodgers, William (EEO)

Betreff: RE: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Hi Carsten,

Just to pass along a request from EPA for the A8 testing - Our cert representative asked if you could provide (along with the usual instructions for testing) the following specific piece of information:

Explanation of operation of stop/start system (including pictures of the dash with examples of stop/start both on and off shown) so that it is clear to the driver how to use the system, and when it is active / inactive.

See you Monday!

Mike

From: Stang, Carsten (N/EA-521)

Sent: Tuesday, September 25, 2012 8:21 AM
To: Rodgers, William (EEO); Thomas, Richard (EEO)

Cc: Giles, Michael (EEO); Freudenberger, Moritz (N/EA-631)

Subject: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Hello Bill, Hello Richard,

Please find attached the weights that we need to adjust the mass of the D4:

<< File: Gewichte\_D3UG-DAQ.pdf >>

Unfortunately it's German but it should be quite easy to understand J

Just in case you're interested in my flight schedule:

<< Message: WG: Reisebestätigung für: STANG /CARSTEN . Abreise 19 Oktober 2012,YZTR7Y >>

As we already talked about I'll be arriving on Saturday Oct 20th and Moritz Freudenberger and myself will check and prepare the car on Sunday Oct 21st.

You don't necessarily have to be there on Sunday, I think it should be enough to have access to the EEO office.

Do we need to fill out an access request again or is the old one still valid?

Anyway, can you please send me us access request for Moritz Freudenberger?

I think Moritz Freudenberger will leave on Wednesday or Thursday. I'll fly to LA on Saturday Oct 27th because we have an OBD-meeting on Oct 30th.

Regards, Carsten

Mit freundlichen Grüßen Best regards

Carsten Stang
Aggregatezulassung Neckarsulm
Emission Certification

AUDI AG N/EA-521 D-74148 Neckarsulm Tel.: +49-7132-31-4009 Mobil (BIK): +49-7132-31-742417 carsten.stang@audi.de www.audi.com

Sitz/Domicile: Ingolstadt

Registergericht/Court of Registry: Amtsgericht Ingolstadt

HRB Nr./Commercial Register No.: 1

Vorsitzender des Aufsichtsrats/Chairman of the Supervisory Board: Martin Winterkorn

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Dürheimer, Bernd Martens, Thomas Sigi, Axel Strotbek

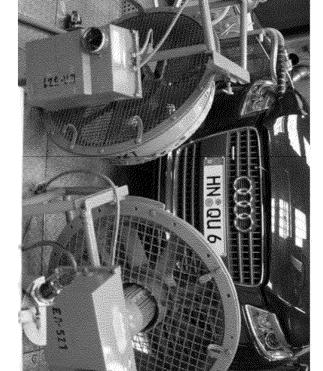
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# **Test Information**



	el Drive	All Wheel Drive
	Loading 2 Day	Precon. EvapCanister
		Front (psi) / Rear (psi)
	39 / 38	Road Tire Pressure:
	2480 / 2083	Front Axle (lbs) / Rear Axle (lbs)
	4563	Design Curb Weight * (lbs)
	9.5 (361)	40 % Fuel Fill (gal)
328	-11.510 / 0.18809 / 0.013328	Dyno Set Coefficients (lb f; lb f/mph; lb f/ mph^2)
57	39.791 / 0.36172 / 0.014957	Road Track Coefficients (lb f; lb f/mph; lb f/ mph^2)
<u> </u>	4750	Equivalent Test Weight (lbs)
	Testversion 1	Vehicle ID: D3UG-DAQ



on the left side of the rear legroom positioned close to the rear seat. 42 lbs on the right side of the rear legroom positioned close to the rear seat \* Weight adjustment: a total of 136 lbs (61 kg). 32 lbs in the passenger legroom positioned close to the bulkhead. 62 lbs

N/EA-521, Stang, 09-25-12

# Vehicle ID: D3UG – DAQ

## <u>Handling / Starting Instructions:</u>

- If the engine is off the transmission locks in "P" position. To unlock the transmission to move the car on the dyno you have to pull the lever on the driver side leg room. The lever can be secured with the small aluminum bar. If the car is well positioned on the dyno you have to push the lever back to the ground. Please ensure that the button is pushed back to the ground before starting the test.
- To avoid any warning messages the hood has to be closed. Therefore both hood locks have to be closed manually.
- The car is equipped with a keyless go system. Therefore the key has to be inside the car and has to be positioned close to the driver. Without applying the brake pedal push "Engine Start / Stop"-button once till ignition is on (see of attached picture). To start the engine you have to apply the brake pedal and push the "Engine Start / Stop"-button a second time till the engine cranks. Thereafter release the button. Now with the engine running the transmission can be shifted by drawing back the gearshift lever. Be careful that the transmission is in "D" position indicated by a "D" on the instrument panel.

### Location of Fuel Tank Drain Hoses:

- In the passenger compartment (right and left rear leg room)

### Location of Fuel Filler Door Release:

- Simply push the fuel filler door (right side of the vehicle) on the rear center of the flap for release

### **Traction Control:**

- As the car will be tested as four wheel drive no action is necessary

### Fan Placement:

- 2 Fans central in front of the car as approved by administrator, for reference see Test information sheet.

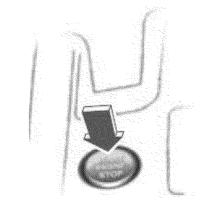
# Start/Stop System

- The car is equipped with a start/stop system that can be activated / deactivated by the driver. The system always uses the last mode of operation that was selected by the driver (last mode functionality). The system can be switched on / off by pressing the start-stop-button on the dashboard (see of attached picture). A deactivated system is indicated by a LED integrated into the start-stop-button. Please ensure that the system is switched off before starting the test. Therefore the start-stop-button has to be illuminated.









```
To:
         Jim Snyder/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; Joel
Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc
Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert
Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael
Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio
Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul
Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"
      [Domenic.Rist@audi.de]: hris Nevers/AA/USEPA/US@EPA:Joel
Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc
Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert
Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael
Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio
Fernandez/AA/USEPA/US@EPA; Glenn Passavant/AA/USEPA/US@EPA; Paul
Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"
      [Domenic.Rist@audi.de]; oel Ball/AA/USEPA/US@EPA;Joel
Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts
French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom
Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan
Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn
Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad
Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"
                                                     [Domenic.Rist@audi.de]; oel
Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts
French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom
Anderson/AA/USEPA/US@EPA; Michael Olechiw/AA/USEPA/US@EPA; Alan
Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn
Passavant/AA/USEPA/US@EPA; Paul Machiele/AA/USEPA/US@EPA; Tad
                                                     [Domenic.Rist@audi.de]; inc
Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"
Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert
Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael
Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio
Fernandez/AA/USEPA/US@EPA; Glenn Passavant/AA/USEPA/US@EPA; Paul
Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"
      [Domenic.Rist@audi.de]; oberts French/AA/USEPA/US@EPA;Robert
Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael
Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio
Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul
Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"
      [Domenic.Rist@audi.de]; obert Peavyhouse/AA/USEPA/US@EPA;Tom
Anderson/AA/USEPA/US@EPA; Michael Olechiw/AA/USEPA/US@EPA; Alan
Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn
Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad
Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"
                                                     [Domenic.Rist@audi.de]; om
Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan
Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn
Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad
Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"
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Olechiw/AA/USEPA/US@EPA:Alan Stout/AA/USEPA/US@EPA:Antonio
Fernandez/AA/USEPA/US@EPA:Glenn Passavant/AA/USEPA/US@EPA:Paul
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      [Domenic.Rist@audi.de]; lan Stout/AA/USEPA/US@EPA;Antonio
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      [Domenic.Rist@audi.de]; ntonio Fernandez/AA/USEPA/US@EPA;Glenn
Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad
Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"
                                                     [Domenic.Rist@audi.de]; lenn
Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad
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Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; aul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)"

[Domenic.Rist@audi.de]; ad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Rech,

Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]

Cc: "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Johnson, Stuart (EEO)"

[Stuart.Johnson@vw.com]

From: "Kata, Leonard (EEO)"
Sent: Sat 10/20/2012 2:48:29 PM

Subject: VOlkswagen Group Meetings with USEPA

winmail.dat

00 Draft Agenda EPA Cert-Test.pdf

00 Draft Agenda Tier3.pdf

To all:

The Volkswagen Group has two meeting scheduled with EPA on Monday October 29, 2012.

At this time, I am writing to forward the attached copies of both agendas for your reference and planning.

- 1. The first meeting involves certification, test procedure, and labeling topics and our primary EPA contact is Jim Snyder. The meeting takes place from 1:00 3:00 p.m.
- 2. The second meeting addresses "Tier 3" topics, and our primary EPA contact is Michael Olechiw The meeting takes place from 4:00 to 5:00 p.m.

We look forward to seeing you in Ann Arbor on the 29th.

Best regards,

Len

\_\_\_\_

Leonard W. Kata
Senior Manager
Emission Regulations and Certification
Engineering and Environmental Office
Volkswagen Group of America, Inc.

Phone: (248) 754-4204 Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

00 Draft Agenda EPA Cert-Test.pdf 00 Draft Agenda Tier3.pdf			
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Best regards,			
Len			
Leonard W. Kata			
Senior Manager			
Emission Regulations and Certification			

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Giles, Michael (EEO)" Mon 10/22/2012 6:59:43 PM
Subject:	Diesel nozzle
Hi Jim,	
I received y	your messages and we talked to Ben, who indicated that the filling issue should be resolved.
Please let r	me know if there are further issues.
Regards,	
Mike	
Michael Gi	les
Certificatio	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	lin Road
Auburn Hil	ls, MI 48326
United Stat	tes of America
Phone +1-2	248-754-4229
FAX +1-248	8-754-4207

To: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]

Cc: "Giles, Michael (EEO)" [michael.giles@vw.com]; arsten.stang@audi.de[]

From: CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Mon 10/22/2012 7:37:20 PM

Subject: Re: FW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

carsten.stang@audi.de

www.audi.com

carsten.stang@audi.de

www.audi.com

I think we've figured it out. It has to do with fuel nozzle diameters.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US

To: "Giles, Michael (EEO)" < michael.giles@vw.com>, carsten.stang@audi.de

Cc: Ben Haynes/AA/USEPA/US@EPA

Date: 10/22/2012 02:11 PM

Subject: Re: FW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Mike, Carsten, the lab is having trouble fueling the vehicle due to a flapper door blocking the fuel nozzle. it doesn't seem to retract with our nozzle. Any trick to it? Please call me or if I'm not there, call Ben at 214-4261.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 10/19/2012 07:44 AM

Subject: FW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Hi Jim,

As a follow up to your request yesterday, please advise if you need additional information for the stop/start instructions (please see the vehicle prep pdf file).

From: Stang, Carsten (N/EA-521)

Sent: Friday, October 19, 2012 5:19 AM

To: Giles, Michael (EEO)

Cc: Rodgers, William (EEO); Schuetze, Michael (N/EA-521)

Subject: AW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Hi Mike,

Please find attached the test information and vehicle preparation instructions that I prepared for the confirmatory testing of the D4 TDI:

The vehicle preparation instructions are more or less the same that we provided with the D4 4.0T in May. As we had no trouble back then these information should be sufficient this time, too.

Please call me in case you have any comments or ideas to improve the instructions.

Thanks and regards, Carsten

Mit freundlichen Grüßen Best regards

Carsten Stang Aggregatezulassung Neckarsulm **Emission Certification** 

**AUDI AG** N/EA-521 D-74148 Neckarsulm Tel.: +49-7132-31-4009

Mobil (BIK): +49-7132-31-742417 carsten.stang@audi.de

www.audi.com

Sitz/Domicile: Ingolstadt

Registergericht/Court of Registry: Amtsgericht Ingolstadt

HRB Nr./Commercial Register No.: 1

Vorsitzender des Aufsichtsrats/Chairman of the Supervisory Board: Martin Winterkorn

Vorstand/Board of Management: Rupert Stadler (Vorsitzender/Chairman), Luca de Meo, Frank Dreves, Wolfgang Dürheimer, Bernd Martens, Thomas Sigi, Axel Strotbek

Wichtiger Hinweis: Die vorgenannten Angaben werden jeder E-Mail automatisch hinzugefügt und lassen keine Rückschlüsse auf den Rechtscharakter der E-Mail zu.

Important Notice: The above information is automatically added to this e-mail. This addition does not constitute a representation that the content of this e-mail is legally relevant and/or is intended to be legally binding upon AUDI AG.

Von: Giles, Michael (EEO)

Gesendet: Donnerstag, 18. Oktober 2012 22:31

An: Stang, Carsten (N/EA-521) Cc: Rodgers, William (EEO)

Betreff: RE: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Hi Carsten,

Just to pass along a request from EPA for the A8 testing - Our cert representative asked if you could provide (along with the usual instructions for testing) the following specific piece of information:

Explanation of operation of stop/start system (including pictures of the dash with examples of stop/start both on and off shown) so that it is clear to the driver how to use the system, and when it is active / inactive.

See you Monday!

Mike

From: Stang, Carsten (N/EA-521)

Sent: Tuesday, September 25, 2012 8:21 AM To: Rodgers, William (EEO); Thomas, Richard (EEO)

Cc: Giles, Michael (EEO); Freudenberger, Moritz (N/EA-631)

Subject: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Hello Bill, Hello Richard,

Please find attached the weights that we need to adjust the mass of the D4:

<< File: Gewichte\_D3UG-DAQ.pdf >>

Unfortunately it's German but it should be quite easy to understand J

Just in case you're interested in my flight schedule:

<< Message: WG: Reisebestätigung für: STANG /CARSTEN . Abreise 19 Oktober 2012,YZTR7Y >>

As we already talked about I'll be arriving on Saturday Oct 20th and Moritz Freudenberger and myself will check and prepare the car on Sunday Oct 21st.

You don't necessarily have to be there on Sunday, I think it should be enough to have access to the EEO office.

Do we need to fill out an access request again or is the old one still valid?

Anyway, can you please send me us access request for Moritz Freudenberger?

I think Moritz Freudenberger will leave on Wednesday or Thursday. I'll fly to LA on Saturday Oct 27th because we have an OBD-meeting on Oct 30th.

Regards, Carsten Mit freundlichen Grüßen Best regards

Carsten Stang
Aggregatezulassung Neckarsulm
Emission Certification

AUDI AG N/EA-521 D-74148 Neckarsulm Tel.: +49-7132-31-4009 Mobil (BIK): +49-7132-31-742417 carsten.stang@audi.de www.audi.com

Sitz/Domicile: Ingolstadt

Registergericht/Court of Registry: Amtsgericht Ingolstadt

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Vorsitzender des Aufsichtsrats/Chairman of the Supervisory Board: Martin Winterkorn

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Dürheimer, Bernd Martens, Thomas Sigi, Axel Strotbek

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[attachment "Testinfo D3UG\_DAQ.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "Vehicle Prep for EPA D3UG-DAQ.pdf" deleted by Jim Snyder/AA/USEPA/US]

To: Verify Help Desk [verifyhelp@csc.com]
Cc: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"
Sent: Tue 10/23/2012 8:29:17 PM

**Subject:** Please help with email problem - repeated test waiver notices.

image001.png

<u>here</u>

I was in my Audi inbox today (login Ex. 6) and noticed dozens (if not hundreds?) of repeated messages to notify of test waiver. There should have been only one message for each of 2 configurations.

The emails started on 10/18 and are still coming at a rate of a few per hour.

Here is text from one example:

· From: Verify Administrator

Date: 10/21/2012 1:50:15 AM

Confirmatory Test for the following Vehicle has been Waived: Manufacturer: ADX Vehicle ID: DAV 558

Vehicle Configuration: 0

Vehicle ID: DAV 558

Vehicle Configuration #: 0

Test Group Name: DADXV05.2LR8

Transaction Identifier: \_e48ab268-7123-4026-acc7-def060e6ea67

Click here to view the status history.

Thank you for submitting your request to Verify via CDX.

Also here is a screen shot of my inbox when it started (and continues through today). I am sure it is still running. Please assist... Thank you in advance!

## [IMAGE]

Michael Giles

**Certification Specialist** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229



To: "Giles, Michael (EEO)" [michael.giles@ww.com]

Cc: Jim Snyder/AA/USEPA/US@EPA[]

From: Ex. 6

**Sent:** Tue 10/23/2012 9:49:59 PM

Subject: Re: Please help with email problem - repeated test waiver notices. (HLP-3073)

Hello Mr. Giles,

Verify help desk ticket HLP-3073 was opened for your inquiry.

Please check your inbox to see if the "Confirmatory Test Waived (DAV 558/0)" notifications have stopped now. Also, will you please send the transaction id in the "Confirmatory Test Waived (DAV 558/1)" notification?

Ex. 6

Verify Help Desk Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Giles, Michael

(EEO)"

<michael.giles@vw To

.com> Verify Help Desk@CSC

СС

10/23/2012 04:29 "Jim Snyder

PM (Snyder.Jim@epamail.epa.gov)"

<Snyder.Jim@epamail.epa.gov>

Subject

Please help with email problem - repeated test waiver notices.

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Vehicle ID: DAV 558

Vehicle Configuration #: 0

Test Group Name: DADXV05.2LR8

Transaction Identifier: \_e48ab268-7123-4026-acc7-def060e6ea67

Click here to view the status history.

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Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Verify Help Desk [verifyhelp@csc.com]
Cc: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"

**Sent:** Wed 10/24/2012 11:56:01 AM

Subject: RE: Please help with email problem - repeated test waiver notices. (HLP-3073)

Thanks, the Config 0 emails have stopped.

Here is the ID for #1: Transaction Identifier: \_217021d8-e37f-4407-9caf-edf10d8fffcc

----Original Message----

From: \_\_\_\_\_\_\_ @csc.com] On Behalf Of Verify Help Desk

Sent: Tuesday, October 23, 2012 5:50 PM

To: Giles, Michael (EEO)

Cc: Snyder.Jim@epamail.epa.gov

Subject: Re: Please help with email problem - repeated test waiver notices. (HLP-3073)

Hello Mr. Giles,

Verify help desk ticket HLP-3073 was opened for your inquiry.

Please check your inbox to see if the "Confirmatory Test Waived (DAV 558/0)" notifications have stopped now. Also, will you please send the transaction id in the "Confirmatory Test Waived (DAV 558/1)" notification?

## Ex. 6

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Giles, Michael

(EEO)"

<michael.giles@vw To

.com> Verify Help Desk@CSC

CC

10/23/2012 04:29 "Jim Snyder

PM (Snyder.Jim@epamail.epa.gov)"

<Snyder.Jim@epamail.epa.gov>

Subject

Please help with email problem -

repeated test waiver notices.
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Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

	Jim Snyder/AA/USEPA/US@EPA[] "Giles, Michael (EEO)" Thur 10/25/2012 7:52:17 PM VW Group - Service manuals rin.vw.com/
Hi Jim,	
For access	to VW Group service manuals, please visit our Erwin site: https://erwin.vw.com/
From there	, go to the "My erwin" link in the upper right and register.
Then, send	me back your user ID and I will forward it to the guy who can set up your account at no charge.
Thanks,	
Mike	
Michael Gil	es es
Certificatio	n Specialist
Engineering	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	in Road
Auburn Hill	s, MI 48326
United Stat	res of America
Phone +1-2	48-754-4229
FAX +1-248	3-754-4207

To: Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]  Cc: "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]
From: "Giles, Michael (EEO)"  Sent: Fri 10/26/2012 2:49:46 PM
Subject: VW Vehicle delivery
Hi Jim, Hi Vince,
Just to confirm, we are planning to deliver the Audi A5 to your facility Monday morning. We should be there between 9 and 9:30 am.
Please pass the reminder along to Ben.
Thanks
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

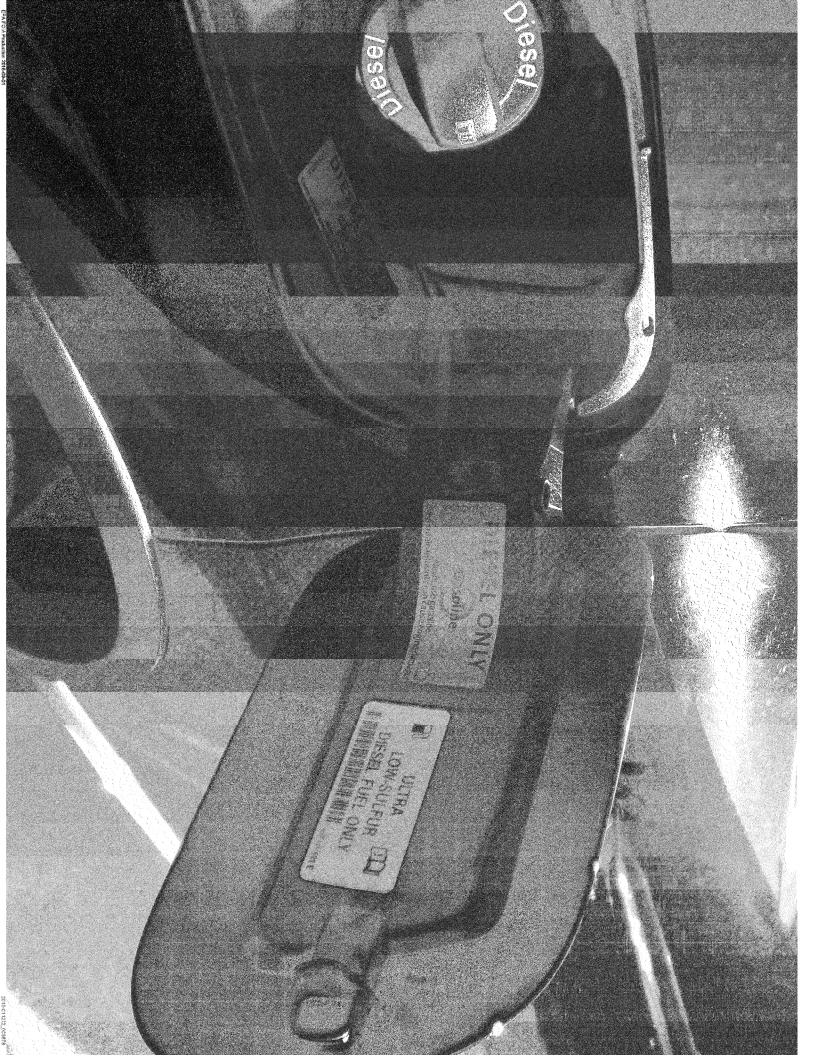
(EEO)" [Ri From: Sent:	"Giles, Michael (EEO)" [michael.giles@ww.com] CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" (ata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Thomas, Richard chard.Thomas@vw.com] CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US Fri 10/26/2012 2:58:00 PM Re: VW Vehicle delivery
Thanks for t	the "heads up" Mike.
Have a grea	t weekend!
Vince Maza	itis
To: Jim Cc: "TI <leonard.k Date: 10</leonard.k 	iles, Michael (EEO)" <michael.giles@vw.com> n Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA nomas, Richard (EEO)" <richard.thomas@vw.com>, "Kata, Leonard (EEO)" ata@vw.com&gt; /26/2012 10:50 AM V Vehicle delivery</richard.thomas@vw.com></michael.giles@vw.com>
Hi Jim, Hi V	ince,
	irm, we are planning to deliver the Audi A5 to your facility Monday morning. We should be een 9 and 9:30 am.
Please pass	the reminder along to Ben.
Thanks	
Mike	
Michael Gil	es
Certification	n Specialist
Engineering	g and Environmental Office
Volkswagen Group of America, Inc.	

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229





To: Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]; from: "Giles, Michael (EEO)" Sent: Mon 10/29/2012 3:33:12 PM Subject: VW - A8 TDI
Hi Jim, Hi Vince,
Just following up on our A8 TDI, can you check latest status and let us know how the schedule looks?
Thanks,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Cc: From: Sent: Subject:	"Giles, Michael (EEO)" [michael.giles@vw.com] CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[] CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US Mon 10/29/2012 5:04:10 PM Re: VW - A8 TDI
Hello Mike	),
I checked v move.	with the lab and everything for 329 is still on hold. We'll let you know when things start to
Thanks Mil	ke,
Vince Maz	aitis
To: Jii	Giles, Michael (EEO)" <michael.giles@vw.com> m Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA D/29/2012 11:33 AM W - A8 TDI</michael.giles@vw.com>
Hi Jim, Hi	Vince,
Just follow	ring up on our A8 TDI, can you check latest status and let us know how the schedule looks?
Thanks,	
Mike	
Michael Gi	iles
Certificatio	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Haml	lin Road
Auburn Hil	ls, MI 48326

United States of America

Phone +1-248-754-4229

To: Vincent Mazaitis/AA/USEPA/US@EPA[] Cc: Jim Snyder/AA/USEPA/US@EPA[] From: "Giles, Michael (EEO)" Mon 10/29/2012 5:05:21 PM Sent: Subject: RE: VW - A8 TDI michael.giles@vw.com Thanks for the update Vince From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov] Sent: Monday, October 29, 2012 1:04 PM To: Giles, Michael (EEO) Cc: Snyder.Jim@epamail.epa.gov Subject: Re: VW - A8 TDI Hello Mike, I checked with the lab and everything for 329 is still on hold. We'll let you know when things start to move. Thanks Mike, Vince Mazaitis From: "Giles, Michael (EEO)" <michael.giles@vw.com> To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA 10/29/2012 11:33 AM Date: Subject: VW - A8 TDI Hi Jim, Hi Vince,

Just following up on our A8 TDI, can you check latest status and let us know how the schedule looks?

Thanks,

Mik	e
-----	---

Michael Giles

**Certification Specialist** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

To: "Giles, Michael (EEO)" [michael.giles@vw.com] "Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Thomas, Richard (EEO)" Cc: [Richard.Thomas@vw.com]; Rodgers, William (EEO) [William.Rodgers@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]; N=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[] From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US Sent: Mon 10/29/2012 6:59:19 PM Subject: Re: VW - A5 Schedule Hello Mike, DFUB-BAQ is scheduled to roadload and prep tomorrow, 10/30/12, and test on 10/31/12. I would suggest to have Domenic and the other engineer here at 7:00 a.m. If there is a change, I'll let you know. Ben noted there are some concerns with the vehicle. The tires on the vehicle are a different size than listed on the door jamb of the vehicle and in Verify. Please get with Jim Snyder or David Wright on that. Also there are no instructions on accessing the electronic oil level indication system, which is something we need to do. Thanks Mike, Vince Mazaitis "Giles, Michael (EEO)" < michael.giles@vw.com> From: To: Vincent Mazaitis/AA/USEPA/US@EPA Cc: "Rist, Domenic (I/EA-523)" <Domenic.Rist@audi.de>, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Rodgers, William (EEO)" <William.Rodgers@vw.com> Date: 10/29/2012 01:51 PM Subject: VW - A5 Schedule Hello Vince, Just a small request related to the A5 test schedule: Domenic and one other engineer would like to witness the start of test. So, if you could keep us advised of the planned start time then they will plan to meet you then. Thanks, Mike

Michael Giles

**Certification Specialist** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

To: Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA;Ben

Haynes/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA;Ben

Haynes/AA/USEPA/US@EPA[]; en Haynes/AA/USEPA/US@EPA[] **Cc:** "Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]

From: "Giles, Michael (EEO)"
Sent: Tue 10/30/2012 1:27:27 PM
Subject: RE: VW - A5 Schedule

snyder.jim@epa.gov

Hello All,

The supplemental dataset for the A5 has been changed to reflect the tire size 225/50 R17.

Please let me know ASAP if you have any other questions.

Thanks,

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, October 29, 2012 5:08 PM

To: Mazaitis.Vincent@epamail.epa.gov; Haynes.Ben@epamail.epa.gov

Cc: Giles, Michael (EEO); Rist, Domenic (I/EA-523)

Subject: Re: VW - A5 Schedule

Ben I talked to Domenic and he is looking into the tire issue. regardless of which tires, I want to confirm that we have the correct target ABCs before we do a road load. Mike, the supplemental's tire info needs to be corrected

Also, Domenic will bring a scan tool to look at the oil level tuesday.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

To: Jim Snyder/AA/USEPA/US@EPA[]
From: "Giles, Michael (EEO)"
Sent: Wed 10/31/2012 2:22:36 PM
Subject: Variable speed fan for FTP
Jenny.Sigelko@VW.com

Hi Jim,

Can you give us any feedback about the use of variable speed fans for the FTP – is this currently acceptable? It sounds like we may want to do that for at least one vehicle in the future.

Thanks,

Mike

PS – please don't forget to register in the link I sent you, then send me your account name and we can get you free access to the service manuals.

From: Rodgers, William (EEO)

Sent: Wednesday, October 31, 2012 10:12 AM

To: Giles, Michael (EEO)

Subject: FW: FTP test procedures

From: Sigelko, Jenny (EEO)

Sent: Thursday, October 25, 2012 6:30 AM

To: Rodgers, William (EEO)

Cc: Braun, Marcus (N/EA-521); Stang, Carsten (N/EA-521)

Subject: RE: FTP test procedures

I believe it is acceptable to use a variable fan if you keep the hood closed. I will have to check to make sure. The new 1066 is going to be very clear that this method is allowable, but I think EPA does allow it right now, keeping the hood closed. I'll confirm and reply again.

Thanks
Jenny Sigelko
Volkswagen Group of America
EEO-Auburn Hills MI
248 754 4214
Jenny.Sigelko@VW.com
From: Rodgers, William (EEO) Sent: Tuesday, October 23, 2012 1:31 PM
To: Sigelko, Jenny (EEO) Cc: Braun, Marcus (N/EA-521); Stang, Carsten (N/EA-521)
Subject: FTP test procedures
Hello Jenny,
The question was raised by Audi whether variable speed fans are allowed during the FTP cycle. We are locating for the current language which I'm pretty sure spells out a fixed fan volume. In the meantime, do you know if there has been any discussion about this for the new 1066 regulations.
Bill Rodgers
VWGoA EEO

(248) 754-4219

**To:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; im Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)"

[William.Rodgers@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]

Cc: "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]

From: "Kata, Leonard (EEO)"

Sent: Wed 10/31/2012 9:57:13 PM

Subject: 2.0L TDI Diesel Discussion

When: Wednesday, November 07, 2012 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).

Where: Telephone Conference

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*

Hello all:

We would like to have a telephone conference with EPA to discuss the 2.0L TDI diesel that was recently tested at the EPA laboratory.

A local and toll-free dial in is provided below, as well as the passcode.

Please let me know if this date and time is acceptable.

Best regards,

Len

Leonard W. Kata
Senior Manager
Emission Regulations and Certification
Engineering and Environmental Office
Volkswagen Group of America, Inc.
Phone: (248) 754-4204

Phone: (248) 754-4204 Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com<mailto:leonard.kata@vw.com>

.....

Join online meeting<https://join.vw.com/leonard.kata/76929Z78>

https://join.vw.com/leonard.kata/76929Z78

Join by Phone

Ex. 6

Find a local number<https://dialin.vw.com>

Conference ID: Ex. 6

Forgot your dial-in PIN?<a href="https://dialin.vw.com">https://dialin.vw.com</a> | First online meeting?<a href="http://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>"http://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>"https://dialin.vw.com</a> | First online meeting?<a href="https://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>"https://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>"https://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>"https://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>"https://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>"https://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>"https://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>"https://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>"https://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bl

1

To: Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]  Cc: "Stang, Carsten (N/EA-521)" [Carsten.Stang@audi.de]; Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  From: "Giles, Michael (EEO)"  Sent: Fri 11/2/2012 2:14:52 PM  Subject: VW A8 Test
Hello Jim and Vince,
Just a couple things related to the A8 tests next week:
- Due to the fact that there is current drain when the vehicle sits with the key (the vehicle and the key "talk to each other") - could you arrange to have a charger connected to the vehicle battery over the weekend? This would be helpful to prevent any complications from a dead battery.
- Just a reminder - we are requesting the use of 2 small fans (FTP/HWY) and 2 large fans for US06, which is the same setup used for the other 3.0L TDI vehicles (Q7 and Touareg). The details are provided in the supplemental information, please advise if there are any concerns.
I plan to confirm the test schedule with you Monday. If all goes as planned I will also be there to see the start of test Tuesday.
Thanks,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

To: From: Sent:	Jim Snyder/AA/USEPA/US@EPA[] "Giles, Michael (EEO)" Fri 11/2/2012 6:03:13 PM	
Subject:	VW Group - Question about current measurement	
Hi Jim,		
	I be able to tell us what kind of analyzer is used for current measurement for the hybrids? nfirm that it is similar to what we use to understand our correlation.	We
Thanks,		
Mike		
Michael Gi	les	
Certification	on Specialist	
Engineerin	g and Environmental Office	
Volkswage	n Group of America, Inc.	
3800 Haml	lin Road	
Auburn Hil	ls, MI 48326	
United Sta	tes of America	
Phone +1-2	248-754-4229	
FAX +1-248	8-754-4207	

To: Jim Snyder/AA/USEPA/US@EPA[]  Cc: "Giles, Michael (EEO)" [michael.giles@ww.com]; Rodgers, William (EEO)"     [William.Rodgers@vw.com]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]  From: "Kata, Leonard (EEO)"  Sent: Mon 11/5/2012 12:06:33 PM  Subject: 2.0L TDI Diesel Confernece Call
Hello Jim:
I understand that you had asked Mike Giles about the content of the telephone conference we wish to have at 10:00 a.m. on Wednesday, November 7, 2012. As you recall, we recently tested a 2.0L TDI Diesel vehicle at EPA. The vehicle exceeded the emission standard, and was removed from the laboratory for analysis. We wish to present our engineering analysis and discuss next steps. I expect the meeting to be more of a technical discussion, than one regarding policy.
I assume that the meeting time and date is acceptable. Please let me know if any changes are necessary. The dial-in information is in the invitation and shown below:
Join by Phone
Local: +1 (248) 754-6400, or
Toll free: +1 (855) 858-8080
Conference ID: Ex. 6
Best regards,
Len
Leonard W. Kata
Senior Manager

**Emission Regulations and Certification** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

To: Mazaitis Cc: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent s/AA/USEPA/US@EPA[] "Rodgers, William (EEO)" [William.Rodgers@vw.com] "Giles, Michael (EEO)" Mon 11/5/2012 5:54:13 PM VW Group Testing
Hi Jim and Vince,	
Could either of you confirm that the A8 TDI testing is still on as planned for tomorrow morning? If so I will be there at 7:00 or let me know otherwise.	
Lastly, when it's available, could you please send me PDF copies of your lab reports for the A5 testing performed last week.	
Thanks,	
Mike	
Michael Giles	
Certification Specialist	
Engineering and Environmental Office	
Volkswagen Group of America, Inc.	
3800 Hamlin Road	
Auburn Hills, MI 48326	
United States of America	
	1-248-754-4229
FAX +1-248-754-4207	

To: "Giles, Michael (EEO)" [michael.giles@vw.com] Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com] CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US From: Sent: Mon 11/5/2012 6:52:50 PM Subject: Re: VW Group Testing Hello Mike, Just a follow-up e-mail, we should have lab data for the A5 later this afternoon, and the A8 diesel test is on track to test tomorrow 11/6/12. Please be here by 7:00 a.m. Thanks Mike, Vince Mazaitis "Giles, Michael (EEO)" <michael.giles@vw.com> From: To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA Cc: "Rodgers, William (EEO)" < William.Rodgers@vw.com> Date: 11/05/2012 12:57 PM Subject: VW Group Testing Hi Jim and Vince, Could either of you confirm that the A8 TDI testing is still on as planned for tomorrow morning? If so I will be there at 7:00 or let me know otherwise.

Lastly, when it's available, could you please send me PDF copies of your lab reports for the A5 testing performed last week.

Thanks,

Mike

Michael Giles

**Certification Specialist** 

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Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael (EEO)"
Sent: Mon 11/5/2012 7:56:03 PM

Subject: RE: VW Group - Question about current measurement

snyder.jim@epa.gov michael.giles@vw.com

Thanks Jim, I believe this will answer the question from the factory.

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, November 05, 2012 2:46 PM

To: Giles, Michael (EEO)

Subject: Re: VW Group - Question about current measurement

We use a Hioki 3193 power meter with a clamp on probe for vehicle measurement. For AC recharge energy, there is another Hioki upstream of the charging outlet.

Jim Snyder
Light-Duty Vehicle Group
Compliance Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 11/02/2012 02:03 PM

Subject: VW Group - Question about current measurement

Hi Jim,

Would you be able to tell us what kind of analyzer is used for current measurement for the hybrids? We want to confirm that it is similar to what we use to understand our correlation.

Thanks, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Vincent Mazaitis/AA/USEPA/US@EPA[]

Cc: Jim Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)"

[William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]

From: "Giles, Michael (EEO)"

Sent: Mon 11/5/2012 9:49:19 PM

Subject: RE: VW Group Testing

michael.giles@vw.com William.Rodgers@vw.com

Thanks Vince.

Could you please copy Bill Rodgers on the lab reports Tuesday, since I did not get the reports yet and I will not have email access tomorrow at EPA.

Regards

Mike

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]

Sent: Monday, November 05, 2012 1:53 PM

To: Giles, Michael (EEO)

Cc: Snyder.Jim@epamail.epa.gov; Rodgers, William (EEO)

Subject: Re: VW Group Testing

Hello Mike,

Just a follow-up e-mail, we should have lab data for the A5 later this afternoon, and the A8 diesel test is on track to test tomorrow 11/6/12. Please be here by 7:00 a.m.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 11/05/2012 12:57 PM Subject: VW Group Testing

Hi Jim and Vince,
Could either of you confirm that the A8 TDI testing is still on as planned for tomorrow morning? If so I will be there at 7:00 or let me know otherwise.
Lastly, when it's available, could you please send me PDF copies of your lab reports for the A5 testing performed last week.
Thanks,
Mike
Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: "Rodgers, William" [William.Rodgers@vw.com]; Giles, Michael (EEO)"

[michael.giles@vw.com]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=DavidA

Wright/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]

From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

**Sent:** Tue 11/6/2012 1:28:50 PM

Subject: Fw: DFUB-BAQ

[Untitled].pdf

Gentlemen,

Please find enclosed the FTP Laboratory Test Results for the Subject vehicle. If you have any questions or concerns, please contact me.

Thank you,

Vince Mazaitis

---- Forwarded by Vincent Mazaitis/AA/USEPA/US on 11/06/2012 08:26 AM -----

From: "EZTech\_Printer" < EZTek@epa.gov>
To: Vincent Mazaitis/AA/USEPA/US@EPA

Date: 11/06/2012 08:24 AM

Subject: DFUB-BAQ

To: "Rodgers, William" [William.Rodgers@vw.com]; Giles, Michael (EEO)"

[michael.giles@vw.com]

Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=DavidA

Wright/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]

From: CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US

**Sent:** Tue 11/6/2012 2:12:02 PM **Subject:** Fw: DFUB-BAQ\_Evap

[Untitled].pdf

Good morning again guys,

Enclosed is the (unofficial) lab copy of the Evap test. Efforts are being make to enter the data into Verify. Again, if you have any questions or concerns, please call me. (Sorry the data is upsidedown!)

Thanks,

Vince Mazaitis

---- Forwarded by Vincent Mazaitis/AA/USEPA/US on 11/06/2012 09:08 AM -----

From: "EZTech\_Printer" <EZTek@epa.gov>
To: Vincent Mazaitis/AA/USEPA/US@EPA

Date: 11/06/2012 09:03 AM Subject: DFUB-BAQ\_Evap

Cc: Vincent Mazaitis/AA/USEPA/US@EPA;"Rhodes, Brian (EEO)"  [Brian.Rhodes@vw.com]; Rhodes, Brian (EEO)"  [Brian.Rhodes@vw.com];  Tremonti, Norm (EEO)" [Norm.Tremonti@vw.com]  From: "Giles, Michael (EEO)"  Sent: Wed 11/7/2012 12:53:45 PM  Subject: VW Group - Release requested for Audi A5		
Hi Jim,		
We would like to request release of the A5. Let us know when it is released and we will arrange to pick it up.		
Thanks!		
Mike		
Michael Giles		
Certification Specialist		
Engineering and Environmental Office		
Volkswagen Group of America, Inc.		
3800 Hamlin Road		
Auburn Hills, MI 48326		
United States of America		
Phone +1-248-754-4229		
FAX +1-248-754-4207		

To:

Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de] From: "Kata, Leonard (EEO)" Wed 11/7/2012 2:49:13 PM Sent: Subject: Slides for Toady's Conference Call NB Engineering Report.pdf.pdf OBD Approval DVWXV02.0U5N E-12-090.pdf KI FACTOR Typo Correction.pdf Hello Jim: Attached is a presentation and background material for today's discussion of the 2.0L TDI. Best regards, Len Leonard W. Kata Senior Manager **Emission Regulations and Certification** Engineering and Environmental Office Volkswagen Group of America, Inc. Phone: (248) 754-4204 Cell: (248) 797-3886

Jim Snyder/AA/USEPA/US@EPA[]

E-Mail: leonard.kata@vw.com

To:





# Air Resources Board

Mary D. Nichols, Chairman 9480 Telstar Avenue, Suite 4 El Monte, California 91731 www.arb.ca.gov



May 3, 2012

Reference No. E-12-090

Oliver Schmidt General Manager Engineering and Environmental Office Volkswagen Group of America, Inc. 3800 Hamlin Road Auburn Hills, MI 48326

Post-It® Fax Note 7671	Date 5/3/12 # of pages > 2
To VW	From CARB
Co./Dept.	Co.
Phone #	Phone #
Fex# 248-759-4207	Fax # 626-575-7012

SUBJECT: Approval of Volkswagen's (VW) On-Board Diagnostic II (OBD II) System for 2013 Model Year Test Group DVWXV02.0U5N

Dear Mr. Schmidt:

The Air Resources Board's (ARB) Engineering Studies Branch has received the OBD II system description submitted by VW for the 2013 model year test group listed above. Representations made in the application indicate that the system is compliant with the OBD II regulation with the exception of NOx adsorber efficiency monitoring and oxygen sensor offset monitoring. Therefore, ARB approves the 2013 model year system with two deficiencies. While not considered deficient, staff has concerns regarding NOx adsorber efficiency monitoring and high temperature disablement. Details regarding the NOx adsorber efficiency monitoring deficiency and high temperature disablement concern are noted below. Details of the remaining deficiency and concern are noted in a previous approval letter (Reference No. E-10-123).

## NOx Adsorber Efficiency Monitoring Deficiency

For the 2013 model year, NOx adsorber efficiency monitoring is required to detect malfunctions at 1.75 times the standard. In presentations to ARB, VW has shown endurance run data indicating false failure decisions for the monitor calibrated at 1.75 times the standard and thus, the monitor has been calibrated to detect failures at 2.25 times the standard. Therefore, NOx adsorber efficiency monitoring is considered to be deficient. In order to remove this deficiency, VW is required to demonstrate robust detection of NOx adsorber efficiency malfunctions at 1.75 times the standard.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <a href="http://www.arb.ca.gov">http://www.arb.ca.gov</a>.

California Environmental Protection Agency

Printed on Recycled Paper

02/02

Mr. Schmidt May 3, 2012 Page 2

## High Temperature Disablement Concern

Engineering Evaluation Section

VW's OBD II strategy includes use of the engine coolant temperature (ECT) sensor to disable intake/exhaust flap adaptation and monitoring at temperatures above the normal operating temperature. However, the temperature used for disablement (94.96°C) is below the temperature which would indicate an over temperature condition to a vehicle operator (e.g., in the red zone of the temperature gauge or when the hot lamp is illuminated, 124°C). Furthermore, VW has indicated that the regulating temperature of the thermostat is 87°C, leaving only an 8°C gap between the regulating temperature and disablement of adaption and monitoring. While VW properly monitors the ECT sensor to identify malfunctions of the sensor itself to falsely indicate a warmer than normal temperature, staff is concerned that a biased high ECT sensor and/or other conditions that may cause actual elevated coolant temperature could disable adaptation/monitoring without any indication to a driver or technician. In order to remove the concern, VW is required to modify the adaptation and diagnostics to avoid disablement at temperatures below the temperature which indicates an over temperature condition to the vehicle operator.

Should you have questions or co	mments regarding this letter, please have your staff
Sincerely,	t .
Ex. 7	•
Ex. 7  Mobile Source Control Division	
CC: <b>Ev. 7</b>	•

Tremonti,	"Giles, Michael (EEO)" [michael.giles@ww.com] "Rhodes, Brian (EEO)" [Brian.Rhodes@vw.com]; N=Jim  J=AA/O=USEPA/C=US@EPA;"Tremonti, Norm (EEO)" [Norm.Tremonti@vw.com];  Norm (EEO)" [Norm.Tremonti@vw.com]; N=DavidA  J=AA/O=USEPA/C=US@EPA[]  CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  Wed 11/7/2012 4:54:09 PM
Subject:	Re: VW Group - Release requested for Audi A5
Hello Mike	,
	al" results are finally in Verify. You may pick up the vehicle at any time. The vehicle is in the ad the keys are with Security as usual.
Thanks for	your patience Mike!
Vince Maza	aitis
To: Jir Cc: Vi "Tremonti, Date: 11	illes, Michael (EEO)" <michael.giles@vw.com> m Snyder/AA/USEPA/US@EPA ncent Mazaitis/AA/USEPA/US@EPA, "Rhodes, Brian (EEO)" <brian.rhodes@vw.com>, Norm (EEO)" <norm.tremonti@vw.com> ./07/2012 07:54 AM N Group - Release requested for Audi A5</norm.tremonti@vw.com></brian.rhodes@vw.com></michael.giles@vw.com>
Hi Jim,	
We would up.	like to request release of the A5. Let us know when it is released and we will arrange to pick it
Thanks!	
Mike	
Michael Gi	les
Certificatio	n Specialist
Engineerin	g and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

Snyder/AA/USEPA/US@EPA[]  Cc: "Rodgers, William (EEO)" [William.Rodgers@vw.com]
From: "Giles, Michael (EEO)"
Sent: Wed 11/7/2012 8:11:50 PM Subject: RE: Voice Mail from Vincent Mazaitis (Work) (28 seconds)
7342144864
Learn More
<u>7342144864</u> (734) 214-4864
Mazaitis.Vincent@epamail.epa.gov
Hi Vince,
Thanks for the follow up. Despite earlier intentions, as of now we will not plan to go to EPA for the
Thursday tests.
SO, please call either Bill or I if there are any issues. We will follow up from here as best we can, or drive
there if needed.
Thanks
Mike
IVIIKE
From: Microsoft Outlook On Behalf Of Vincent Mazaitis
From: Microsoft Outlook On Behalf Of Vincent Mazaitis Sent: Wednesday, November 07, 2012 1:53 PM
From: Microsoft Outlook On Behalf Of Vincent Mazaitis Sent: Wednesday, November 07, 2012 1:53 PM To: Giles, Michael (EEO)
From: Microsoft Outlook On Behalf Of Vincent Mazaitis Sent: Wednesday, November 07, 2012 1:53 PM To: Giles, Michael (EEO)
From: Microsoft Outlook On Behalf Of Vincent Mazaitis Sent: Wednesday, November 07, 2012 1:53 PM To: Giles, Michael (EEO)
From: Microsoft Outlook On Behalf Of Vincent Mazaitis Sent: Wednesday, November 07, 2012 1:53 PM To: Giles, Michael (EEO) Subject: Voice Mail from Vincent Mazaitis (Work) (28 seconds)
From: Microsoft Outlook On Behalf Of Vincent Mazaitis Sent: Wednesday, November 07, 2012 1:53 PM To: Giles, Michael (EEO) Subject: Voice Mail from Vincent Mazaitis (Work) (28 seconds)
From: Microsoft Outlook On Behalf Of Vincent Mazaitis Sent: Wednesday, November 07, 2012 1:53 PM To: Giles, Michael (EEO) Subject: Voice Mail from Vincent Mazaitis (Work) (28 seconds)
From: Microsoft Outlook On Behalf Of Vincent Mazaitis Sent: Wednesday, November 07, 2012 1:53 PM To: Giles, Michael (EEO) Subject: Voice Mail from Vincent Mazaitis (Work) (28 seconds) Voice Mail Preview:

Vincent Mazaitis/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im

To:

Call please give me a call back area code.

7342144864 justice awaited just started a really up on release on o'clock so or give me a call back if you would please thanks bye.

Created by Microsoft Speech Technology. Learn More...

You received a voice mail from Vincent Mazaitis at 7342144864

Caller-Id: 7342144864

Work:

(734) 214-4864

E-mail:

Mazaitis. Vincent@epamail.epa.gov

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William"

**Sent:** Fri 6/10/2011 11:13:39 AM

Subject: RE: VW and Audi Vehicle releases

william.rodgers@vw.com

Yes we will accept the results for the Audi TTRS.

Thanks,

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, June 09, 2011 4:37 PM

To: Rodgers, William

Cc: Mazaitis.Vincent@epamail.epa.gov; Haynes.Ben@epamail.epa.gov

Subject: Re: VW and Audi Vehicle releases

Bill, I assume this means Audi accepts the FE values? I signed off on the two vehicles but I don't know where the keys are and who will be here to contact friday. I think you are better off waiting to Monday when we are all here.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Rodgers, William" < William.Rodgers@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Cc:

"Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Giles, Michael" <michael.giles@vw.com>

Date:

06/09/2011 03:19 PM

Subject:

Vehicle releases

Hello Jim,

Please release the VW Passat and Audi TTRS test vehicles. We hope to pick them up on Friday (tomorrow) and/or Monday.

The Verify results came in today for the TTRS.

Thanks,

Bill Rodgers Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI United States (248) 754-4219 (248) 754-4207 william.rodgers@vw.com

/\_\_\. (o\\_l\_/o) To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William"

**Sent:** Fri 6/10/2011 11:58:33 AM **Subject:** RE: Audi cert request

william.rodgers@vw.com

Jim,

The Audi TTRS (CADXV02.53UK, VID 3UK-AMQ) was one of those certificate requests denied. I resubmitted the Application with the new CSI.

The Cert. Request was resubmitted as non-conditional because we had just completed and passed the confirmatory tests.

The application and CSI will be updated with the new confirmatory test results at the update time as originally planned. Let me know if you need that done now instead.

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, June 09, 2011 6:30 PM

To: Rodgers, William Subject: Audi cert request Bill, Looking through the last cert request and its for the Audi TTRS that we just tested. Its not a conditional cert request either. What am I missing here?

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Rodgers, William"

**Sent:** Mon 6/13/2011 1:04:07 PM **Subject:** FW: Audi cert request

william.rodgers@vw.com

Jim,

Did you need me to resubmit anything on this?

Bill

From: Rodgers, William

Sent: Friday, June 10, 2011 7:59 AM To: 'Snyder.Jim@epamail.epa.gov' Subject: RE: Audi cert request

Jim,

The Audi TTRS (CADXV02.53UK, VID 3UK-AMQ) was one of those certificate requests denied. I resubmitted the Application with the new CSI.

The Cert. Request was resubmitted as non-conditional because we had just completed and passed the confirmatory tests.

The application and CSI will be updated with the new confirmatory test results at the update time as originally planned. Let me know if you need that done now instead.

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, June 09, 2011 6:30 PM

To: Rodgers, William Subject: Audi cert request

Bill, Looking through the last cert request and its for the Audi TTRS that we just tested. Its not a conditional cert request either. What am I missing here?

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov To: "Robert Hart" [Robert.Hart@vw.com]

Cc: VerifyHelp@csc.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Stephen

Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[];

N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]

From: CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US

**Sent:** Mon 6/13/2011 3:11:21 PM

**Subject:** Split-Bag US06 PM Issue (HLP-1321)

Bob,

(Helpdesk: This is in response to help desk ticket HLP-1321)

The core issue is that LOD (the EPA "Laboratory Operations Division") did not have a way of measuring PM for a split bag US06 test. To get around this problem they ran 2 tests, a single bag US06 for certification (measured PM), and a split bag US06 test for the fuel economy "Litmus" calculation. This causes an additional problem, because there can only be 1 "official" test ran and/or entered into Verify.

LOD now has a way of measuring PM for a split bag US06 test, so this shouldn't be an issue in the future, so we do NOT need to modify or suspend any of the current business rules.

I have talked to the certification representatives, and they have agreed to the following short-term work around for this problem:

A "correction" of the split bag test will be submitted with all of the same test results, but we will transfer the PM results from the single bag test to it. We will add a test comment that describes how and why this test was modified, and reference this email. I will make the modification to the test XML file and have our helpdesk submit it as "LOD" so that we can use the LOD fuel properties already in Verify.

The split bag US06 test is Verify test number CVWX91000952, but I do not have the test number for the single bag test.

Please provide me with the test number of the single bag test that contains the PM results, so that I can proceed.

Robert Peavyhouse Compliance and Innovative Strategies Division U.S. EPA - Office of Transportation and Air Quality phone: (734) 214-4814 fax: (734) 214-4869

email: peavyhouse.robert@epa.gov website: http://www.epa.gov/nvfel/

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com]

From: "Rodgers, William"

**Sent:** Tue 6/14/2011 8:27:02 PM

**Subject:** VW Group - New decision information

william.rodgers@vw.com

Hello Jim,

I submitted four new Decision Information's to support a running change. This running change replaces the existing worst case vehicle in test group CADXJ02.03UA.

The new test vehicle is a VW Tiquan 2.0 TFSI 4-motion with automatic transmission. It replaces the same model carried over to 2012 from 2011 model year. This new model represents 100% of 2012 model year Tiquan production. As the result of most changes aimed at improving fuel economy, all configuration require Manufacturer retests due to high FE for the ETW.

The manual transmission tests are forthcoming but I do not have them yet.

We are on a tight schedule with SOP so your decision on the automatics is requested at your earliest convenience.

Regards,

**Bill Rodgers** 

**Engineering and Environmental Office** 

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o) To: Robert Peavyhouse/AA/USEPA/US@EPA[]

Cc: Jim Snyder/AA/USEPA/US@EPA;"Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Hart,

Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]

**From:** "Thomas, Richard (EEO)" **Sent:** Wed 6/15/2011 10:55:01 AM

Subject: RE: Issue(s) update

winmail.dat

message body.rtf

Hi Bob;

If you need test numbers for EPA lab tests and current 2012 model year problems I have regarding bag 1 data for highway EPA tests here is a current listing:

Audi model index #70, city test # 9ADX09010296 (there is bag 4 data entered); highway test #9ADX09010297 (there is bag 1 data entered). I need this one soon because Audi of America has moved up the port release date.

Lamborghini model index #65, highway test # 9ADX09010216 (there is bag 1 data entered)

Regarding another issue; I sent you an email with a problem with the correction to 2010 Lamborghini index #002 and the litmus check not being calculated because the US06 in 2010 was a one bag test and I believe the US06 for the litmus test must have two bags. Do you have a suggestion regarding these US06 two bags?

The third issue for the Volkswagen Group is the rejection of the 2010 CAFE, because we corrected an axle ratio on the Audi TTS model. I can correct the 2010 CAFE input, if I remember how.

If you need anything or have any questions, please let me know.

Thanks,

Richard 248 754-4213

From: Peavyhouse.Robert@epamail.epa.gov [mailto:Peavyhouse.Robert@epamail.epa.gov]

Sent: Tuesday, June 14, 2011 4:50 PM

To: Thomas, Richard (EEO) Subject: Issue(s) update

#### Richard,

The write of the fuel economy values back to the production database should happen tonight.

The initial attempt failed, but we figured out the issues, and it is scheduled to happen ASAP.

I am in the process of getting access to submit tests as LOD, so if we have an EPA test that has fuel economy in for Bag 1 FE, then I will be able to fix this type of problem myself. It will probably take a couple of days to get my LOD permission, but If you still have a couple of these types of issues, I will be able to fix them.

### Robert Peavyhouse

Compliance and Innovative Strategies Division U.S. EPA - Office of Transportation and Air Quality

phone: (734) 214-4814 fax: (734) 214-4869

email: peavyhouse.robert@epa.gov

website: http://www.epa.gov/nvfel/ < http://www.epa.gov/nvfel/>

To: Jim Snyder/AA/USEPA/US@EPA[]  Cc:
Hello Jim,
Please be advised, the Lamborghini FFV test group (CNLXV06.55LX), which was originally planned for late MY 2012, has been postponed to early MY 2013.
Regards,
Ex. 7
Ex. 7
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Ex. 7

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Giles, Michael" Fri 6/17/2011 6:54:45 PM Bugatti
Jim,	
Thank you very much for the attention with Bugatti today, it is greatly appreciated	
Best Regards,	
Mike	

To: richard.thomas@vw.com[]

Cc: christoph.kohnen@vw.com;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[];

N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Fri 6/24/2011 5:08:58 PM

Subject: re: 2012 FE Guide data for web posting on July 15, 2011 - Please review & let EPA

know after the Verify data is error free and ready for posting on www.fueleconomy.gov

VWgroup-2012 FE Guide-6-23-2011.zip

Richard,

Attached are Excel Spreadsheets for each manufacturer which you are handling.

The spreadsheet(s) are encrypted & password protected---with the same password as for the May posting. If you didn't have any FE Label data in EPA's Verify data base for the May posting, I'll call you with the password---or you can call me at 734-214-4450 to get the password. You'll need WinZip 11 or later (or other similar software) to unzip the files. We have WinZip 14.0.

The spreadsheet(s) contain all the 2012 FE label data from EPA's Verify data base as of June 23, 2011. Please review the attached data for errors (including my comments in the first column) and make the appropriate corrections in Verify. Please double check any new FE Labels which you input into Verify (not listed in this spreadsheet) to make sure they are error free. Any corrections should be made directly in the EPA Verify database. [Do not correct the spreadsheet and send it back.] I am forwarding the schedule for the July, 2011 release and some "reminders" for your convenience.

The models highlighted in green fill (if any) contain errors and will not be sent to DOE for web posting unless the errors are corrected.

The last date to make changes for the web posting is July 5, 2011. EPA will review the data on July 6 and forward it to DOE on (or before) July 7 for posting on the web on July 15, 2011.

Here are two additional reminders:

- 1. Model Type Descriptor: The new "model type descriptor" field in Verify release 8 (field GL-78.2 in the FE Label module) should normally be blank. This field should only be used to identify otherwise identical basic engines & model types---e.g. use a "4-valve" descriptor to delineate between otherwise identical 2-valve and 4-valve engines. Please enter "FFV" in the field if the vehicles are flexible fueled vehicles and "FFV" is not contained in the carline name.
- 2. Engine Management System: An "Engine Management System" (field GL-75 in the FE Label module) is defined as an idle stop/start system in Advisory Circular 83A, paragraph IV. B. 2 B. (page 4) as follows:
  - "IV. Definitions
  - B. Transmission Class
- 2. EPA will also distinguish transmission classes based on the presence of the following parameters:
  - b. Engine Management System. Vehicles equipped with an engine management system (a

stop/start engine device such as Volkswagen's SNA system [in the early 1980s]) will be in transmission classes from those not equipped with an engine management system."

separate

Please don't enter "Yes" for that field unless the vehicle is actually equipped with such a system.

Please let me know when you have made all corrections, entered any new labels into Verify and everything is "good to go."

Thanks

---- Forwarded by David Good/AA/USEPA/US on 06/24/2011 10:51 AM -----

From: David Good/AA/USEPA/US

To: Auto Industry Fuel economy representatives

Cc: Linc Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Roberts

French/AA/USEPA/US@EPA, Ching-Shih Yang/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA, Karen

Danzeisen/AA/USEPA/US@EPA, Sandra Somoza/AA/USEPA/US@EPA, hopsonjl@ornl.gov, lij1@ornl.gov

Date: 06/10/2011 09:34 AM

Subject: 2012 FE Guide - Schedule for the July, 2011 web release

To manufacturers,

Here's the schedule for July, 2011 web update for the 2012 FE Guide.

Date Action

June 21 (Tues) EPA staff performs 2012 FE Guide query (separated by mfr, etc) for EPA review

June 22 (Wed) EPA sends FE Guide data to manufacturers for review & corrections

June 22-July 5 Mfrs review & make corrections

July 5 (Tues) Last day for mfr corrections and data entry

July 6 (Wed) EPA staff performs 2012 FE Guide query for EPA review

July 7 (Th) EPA sends final data to DOE

July 15 (Fri) DOE publishes 2012 FE Guide data on web

#### Reminders:

FE Labels with errors won't be posted on the web: FE Labels with errors (which are not corrected in EPA's Verify data base by July 5, 2011) will not be sent to DOE for posting on www.fueleconomy.gov. For example, FE Labels will not be sent to DOE for posting on www.fueleconomy.gov. if they contain errors in the unadjusted combined fuel economy value; errors in the adjusted city, highway or combined fuel economy value; missing interior volume/cargo volume information (required for passenger cars only--except not required for 2-seater vehicles); duplicate entries, etc.

Release date for 2011 Labels: Please be sure that the release date is correct in EPA's Verify data base. For the July release, we will post FE Labels on the web which have a release date of July 15, 2011 and earlier.

2WD SUV Classification: As outlined on page 6 of EPA guidance letter CISD-10-14, Aug 5, 2010, when labeling 2WD SUVs, please continue to use the same vehicle classification category as in past model years (even though 2WD SUVs equal to or less than 6000 lbs GVWR will be included in 2011 and 2012 passenger car CAFEs). Similar to EPA policy for 2011 model year vehicles, EPA will require 2012 and later model year 2WD SUVs to continue to be included in the 2WD SUV comparable class for fuel economy labeling purposes, based on the provisions of 40 CFR

600.315-08(a)(1) and 600.315-08(a)(2) as revised in 74 FR 61537, November 25, 2009.

Fuel Costs: New 2012 fuel costs will be provided to manufacturers in a future EPA guidance letter. Until the 2012 model year fuel costs are provided, manufacturers should continue to use the 2011 model year fuel costs provided in EPA guidance letter CISD-10-14. Please contact Bob Peavyhouse (734-214-4814 or by email) or me if you need a fuel cost for LPG or Hydrogen.

Range of comparable vehicles: Until the 2012 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2011 model year ranges provided in CISD-10-19, Sept 13, 2010 (except if a model exceeds the 2011 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

If you have any questions, feel free to give your team member or me a call or send us an email message. I'm at 734-214-4450.

Regards

To: richard.thomas@vw.com[]

Cc: christoph.kohnen@vw.com;CN=Jim

Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[];

N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts

French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]

From: CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Fri 7/8/2011 1:14:27 PM

Subject: re: 2012 FE Label data in EPA data base as of July 6, 2011 is attached for your review

(including data sent to DOE for web posting) VW-group-2012 FE Guide-7-6-2011.zip

Richard,

The attached 2012 FE Label data for the manufacturer(s) which you are handling were forwarded to DOE on July 7, 2011 for posting on the web at www.fueleconomy.gov. [Only releasable, non-confidential data were forwarded to DOE.] The attached spreadsheet(s) are encrypted & password protected using the same password which I gave you previously.

The attached spreadsheet(s) include all 2012 FE Label data in EPA's Verify data base as of July 6, 2011. Note that the attached spreadsheet(s) also include data which were not forwarded to DOE because the data contains errors or the release date was after July 15, 2011.

Releasable data will be posted on the web on July 15, 2011. The models highlighted in green fill (if any) contain errors and were not sent to DOE for web posting. If the release date was prior to July 15, 2011 for these models, I'll be glad to send the corrected data to DOE for web posting after the errors have been corrected in Verify.

Please review the data and correct Verify if any errors still exist. Please contact me if you find any errors in the releasable data which was sent to DOE for web posting.

As we discussed yesterday, please let me know when the changes to oil viscosity, etc have been made in Verify and I'll send the data to DOE for posting on the web.

**Thanks** 

#### Reminders:

FE Labels with errors won't be posted on the web: FE Labels with errors will not be sent to DOE for posting on www.fueleconomy.gov. For example, FE Labels will not be sent to DOE for posting on www.fueleconomy.gov. if they contain errors in the unadjusted combined fuel economy value; errors in the adjusted city, highway or combined fuel economy value; missing interior volume/cargo volume information (required for passenger cars only--except not required for 2-seater vehicles); duplicate entries, incorrect oil viscosity values, etc.

Release date for 2011 Labels: Please be sure that the release date is correct in EPA's Verify data base. For the July release, we will post FE Labels on the web which have a release date of July 15, 2011 and earlier.

2WD SUV Classification: As outlined on page 6 of EPA guidance letter CISD-10-14, Aug 5, 2010, when labeling 2WD SUVs, please continue to use the same vehicle classification category as in past model years

(even though 2WD SUVs equal to or less than 6000 lbs GVWR will be included in 2011 and 2012 passenger car CAFEs). Similar to EPA policy for 2011 model year vehicles, EPA will require 2012 and later model year 2WD SUVs to continue to be included in the 2WD SUV comparable class for fuel economy labeling purposes, based on the provisions of 40 CFR 600.315-08(a)(1) and 600.315-08(a)(2) as revised in 74 FR 61537, November 25, 2009.

Fuel Costs: New 2012 fuel costs will be provided to manufacturers in a future EPA guidance letter. Until the 2012 model year fuel costs are provided, manufacturers should continue to use the 2011 model year fuel costs provided in EPA guidance letter CISD-10-14. Please contact Bob Peavyhouse (734-214-4814 or by email) or me if you need a fuel cost for LPG or Hydrogen.

Range of comparable vehicles: Until the 2012 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2011 model year ranges provided in CISD-10-19, Sept 13, 2010 (except if a model exceeds the 2011 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

Model Type Descriptor: The new "model type descriptor" field in Verify release 8 (field GL-78.2 in the FE Label module) should only be used to identify otherwise identical basic engines & model types---e.g. enter "4-valve" in the field to delineate between otherwise identical 2-valve and 4-valve engines; enter "FFV" in the field if "FFV" is not contained in the carline name, etc. Note that in some cases, Verify business rules will not allow the field to be blank. Thus, except to identify otherwise identical basic engines & model types, please enter "N/A" (not applicable) or the carline name in the field until the business rule can be revised.

Engine Management System: An "Engine Management System" (field GL-75 in the FE Label module) is defined as an idle stop/start system in Advisory Circular 83A, paragraph IV. B. 2 B. (page 4) as follows:

- "IV. Definitions
- B. Transmission Class
- 2. EPA will also distinguish transmission classes based on the presence of the following parameters:
- b. Engine Management System. Vehicles equipped with an engine management system (a stop/start engine device such as Volkswagen's SNA system [in the early 1980s]) will be in separate transmission classes from those not equipped with an engine management system."

Please enter "Yes" for that field only if the vehicle is actually equipped with such a (stop/start) system.

Questions: If you have any additional questions, feel free to give your team member or me a call or send us an email message. I'm at 734-214-4450.

Regards

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com]

From:

"Rodgers, William" Tue 7/19/2011 11:59:03 AM Sent:

Subject: VW Group - Beetle Manual Trans Tests

william.rodgers@vw.com

Hello Jim,

Just a heads up for you. I submitted new tests and decision information for 2012 VW Beetle 2.5L models with manual transmission in the follow test groups. There is no new technology involved. You have already waived the automatic transmission versions. I will submit the running change letter and revised application yet this week.

Test groups:

CVWXV02.5U35 - Federal-only T2B5

CVWXV02.5259 - 50-State T2B3 / LEV2 SULEV

Thanks,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

(o\ I /o)

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com]

From: "Rodgers, William"

**Sent:** Tue 7/26/2011 11:51:43 AM

Subject: VW Group - Running Change for CVWXV02.5U35

william.rodgers@vw.com

Hello Jim,

I submitted the following running change 03\_11 to add a new FEDV to the test group, Beetle 2.5L Manual trans. I have also submitted the associated Application revision which also includes changes resulting from the previous running change 02\_11. All tests were waived for these running changes. No Certificate revision is required.

Running Change: CBI\_CVWXV02.5U35\_APP\_C03\_R00.PDF

Regards,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/\_\_\. (o\\_l\_/o) To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)"

[Robert.Hart@vw.com]

From:

"Rodgers, William" Tue 7/26/2011 12:14:04 PM Sent:

Subject: VW Group - Running Change for CVWXV02.5259

william.rodgers@vw.com

Hi Jim,

The following running change 02\_11 has been submitted to add a new FEDV, Beetle 2.5L with manual transmission, to this T2/Bin 3 test group. All confirmatory tests were waived. No Certificate revision is required.

Running Change: CBI\_CVWXV02.5259\_APP\_C02\_R00.PDF

Regards,

**Bill Rodgers** 

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc. Rochester Hills, MI

**United States** 

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

From: "Rodgers, William"  Sent: Wed 8/3/2011 3:28:13 PM  Subject: VW Group - OBD Related Field Fix 2007-08 VR6 Engines  CBI 7VWXV03.2535 APPFF02 .PDF  CBI 8VWXV03.2535 APPRC03 .PDF  william.rodgers@vw.com	
Hello Jim,	
The attached OBD related Field Fix letters have been uploaded to Verify for your review. Please let me know if you have any questions.	
Regards,	
Bill Rodgers	
Engineering and Environmental Office	
VOLKSWAGEN Group of America, Inc. Rochester Hills, MI	
United States	
(248) 754-4219	
(248) 754-4207	
william.rodgers@vw.com	

To:

Jim Snyder/AA/USEPA/US@EPA[]

To: From: Sent: Subject:	Jim Snyder/AA/USEPA/US@EPA[] "Giles, Michael" Mon 8/15/2011 2:20:26 PM VW Group Methane Deteroriation Factors
•	
Hello Jim,	
City/Highv	up to my voice message, I was curious about the separate DF's which seem to be required for vay tests, as indicated in the regulations below. Note, we are using the fleet average option. We are using the standard (0.010) so I believe no DF applies.
l would lik	e to discuss briefly if you are available.
Thanks,	
Mike	
Michael G	iles
Certification	on Specialist
Engineerin	g and Environmental Office
Volkswage	n Group of America, Inc.
3800 Ham	lin Road
Auburn Hi	lls, MI 48326
United Sta	tes of America
Phone +1-	248-754-4229
FAX +1-24	8-754-4207

Title 40 § 86.1823-08(m)(2)(ii) and (iii)

- 2) N 2 O and CH 4. (i) For manufacturers complying with the emission standards for N2O and CH4specified in §86.1818–12(f)(1), deterioration factors for N2O and CH4shall be determined according to the provisions of paragraphs (a) through (I) of this section.
- (ii) For manufacturers complying with the fleet averaging option for N2O and CH4as allowed under §86.1818–12(f)(2), separate deterioration factors shall be determined for the FTP and HFET test cycles. Therefore each FTP test performed on the durability data vehicle selected under §86.1822–01 of this part must also be accompanied by an HFET test.
- (iii) For the 2012 through 2014 model years only, manufacturers may use alternative deterioration factors. For N2O, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NOXemissions according to the provisions of this section. For CH4, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.
- (3) Other carbon-related exhaust emissions. Deterioration factors shall be determined according to the provisions of paragraphs (a) through (I) of this section. Optionally, in lieu of determining emission-specific FTP and HFET deterioration factors for CH3OH (methanol), HCHO (formaldehyde), C2H5OH (ethanol), and C2H4O (acetaldehyde), manufacturers may use the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

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## §86.1818-12(f)(2)

- (f) Nitrous oxide (N 2 O) and methane (CH 4) exhaust emission standards for passenger automobiles and light trucks. Each manufacturer's fleet of combined passenger automobile and light trucks must comply with N2O and CH4standards using either the provisions of paragraph (f)(1) of this section or the provisions of paragraph (f)(2) of this section. The manufacturer may not use the provisions of both paragraphs (f)(1) and (f)(2) of this section in a model year. For example, a manufacturer may not use the provisions of paragraph (f)(1) of this section for their passenger automobile fleet and the provisions of paragraph (f)(2) for their light truck fleet in the same model year.
- (1) Standards applicable to each test group.
- (i) Exhaust emissions of nitrous oxide (N2O) shall not exceed 0.010 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.
- (ii) Exhaust emissions of methane (CH4) shall not exceed 0.030 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.
- (2) Including N 2 O and CH 4 in fleet averaging program. Manufacturers may elect to not meet the emission standards in paragraph (f)(1) of this section. Manufacturers making this election shall include N2O and CH4emissions in the determination of their fleet average carbon-related exhaust emissions, as calculated in subpart F of part 600 of this chapter. Manufacturers using this option must include both N2O and CH4full useful life values in the fleet average calculations for passenger automobiles and light trucks. Use of this option will account for N2O and CH4emissions within the carbon-related exhaust emission value determined for each model type according to the provisions part 600 of this chapter. This option requires the determination of full useful life

emission values for both the Federal Test Procedure and the Highway Fuel Economy Test.

Michael Giles

**Certification Specialist** 

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

**United States of America** 

Phone +1-248-754-4229

FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael"

[michael.giles@vw.com]
From: "Rodgers, William"

**Sent:** Wed 8/17/2011 2:54:58 PM

Subject: VW Group - Bentley Mulsanne Application

Hello Jim,

Just a heads up, I submitted a certification request and application for the Bentley test group CBEXV06.84LA. This is a carryover test group from 2011 with no changes. All of the Verify release 8 changes in Section 7 of the application have been satisfied with no place holders necessary.

We have been delayed getting this application submitted due to OBD discussions (see Sec.16 OBD approval letter) so scheduled SOP is rather soon. Any effort you can make to prioritize this Certificate would be appreciated.

Dlasca	let me	know if	iou have	anvo	uestions.
ricase	ICLINE	KHOW H	vou nave	anv u	uesuons.

Regards,

**Bill Rodgers** 

VWGoA

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael"

**Sent:** Wed 8/17/2011 7:17:06 PM

Subject: RE: VW Group Methane Deterioration Factors

Jim,

Thanks for your reply. The regulations do look quite clear cut. I was just looking for a sanity check in case I am missing something.

We can follow up briefly sometime later.

Thanks again,

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, August 17, 2011 1:42 PM

To: Giles, Michael

Subject: Re: VW Group Methane Deterioration Factors

Mike, I don't know why they specify separate DFs. I've tried to find out but most of the people that might know are on vacation so its taking longing to get an answer this week.

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From:

"Giles, Michael" <michael.giles@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

08/15/2011 10:21 AM

Su	h	ے	ct	-	•
Ju	U	U	u	L	

**VW Group Methane Deteroriation Factors** 

Hello Jim,

As a follow up to my voice message, I was curious about the separate DF's which seem to be required for City/Highway tests, as indicated in the regulations below. Note, we are using the fleet average option. For N2O we are using the standard (0.010) so I believe no DF applies.

I would like to discuss briefly if you are available.

Thanks, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

Title 40 § 86.1823-08(m)(2)(ii) and (iii)

- 2) N 2 O and CH 4. (i) For manufacturers complying with the emission standards for N2O and CH4specified in §86.1818–12(f)(1), deterioration factors for N2O and CH4shall be determined according to the provisions of paragraphs (a) through (I) of this section.
- (ii) For manufacturers complying with the fleet averaging option for N2O and CH4as allowed under §86.1818–12(f)(2), separate deterioration factors shall be determined for the FTP and HFET test cycles. Therefore each FTP test performed on the durability data vehicle selected under §86.1822–01 of this part must also be accompanied by an HFET test.
- (iii) For the 2012 through 2014 model years only, manufacturers may use alternative deterioration factors. For N2O, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NOXemissions according to the provisions of this section. For CH4, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

(3) Other carbon-related exhaust emissions. Deterioration factors shall be determined according to the provisions of paragraphs (a) through (I) of this section. Optionally, in lieu of determining emission-specific FTP and HFET deterioration factors for CH3OH (methanol), HCHO (formaldehyde), C2H5OH (ethanol), and C2H4O (acetaldehyde), manufacturers may use the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

------

§86.1818-12(f)(2)

- (f) Nitrous oxide (N 2 O) and methane (CH 4) exhaust emission standards for passenger automobiles and light trucks. Each manufacturer's fleet of combined passenger automobile and light trucks must comply with N2O and CH4standards using either the provisions of paragraph (f)(1) of this section or the provisions of paragraph (f)(2) of this section. The manufacturer may not use the provisions of both paragraphs (f)(1) and (f)(2) of this section in a model year. For example, a manufacturer may not use the provisions of paragraph (f)(1) of this section for their passenger automobile fleet and the provisions of paragraph (f)(2) for their light truck fleet in the same model year.
- (1) Standards applicable to each test group.
- (i) Exhaust emissions of nitrous oxide (N2O) shall not exceed 0.010 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.
- (ii) Exhaust emissions of methane (CH4) shall not exceed 0.030 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.
- (2) Including N 2 O and CH 4 in fleet averaging program. Manufacturers may elect to not meet the emission standards in paragraph (f)(1) of this section. Manufacturers making this election shall include N2O and CH4emissions in the determination of their fleet average carbon-related exhaust emissions, as calculated in subpart F of part 600 of this chapter. Manufacturers using this option must include both N2O and CH4full useful life values in the fleet average calculations for passenger automobiles and light trucks. Use of this option will account for N2O and CH4emissions within the carbon-related exhaust emission value determined for each model type according to the provisions part 600 of this chapter. This option requires the determination of full useful life emission values for both the Federal Test Procedure and the Highway Fuel Economy Test.

Michael Giles
Certification Specialist
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Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: Jim Snyder/AA/USEPA/US@EPA[]

From: "Giles, Michael"

**Sent:** Wed 8/17/2011 8:41:29 PM

Subject: RE: VW Group Methane Deteroriation Factors

Jim,

Thanks for the follow up. At first glance this looks better (allowing single DF from FTP for methane).

We will follow up with you again in the near future on this, after some discussion with our team.

Best Regards,

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, August 17, 2011 3:55 PM

To: Giles, Michael

Subject: Fw: VW Group Methane Deteroriation Factors

Mike, I talked to Tom Anderson who has been more involved with the latest rulemaking . He confirmed what you understood but also added new clarification that is included in the recent HD GHG rule.

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov
----- Forwarded by Jim Snyder/AA/USEPA/US on 08/17/2011 03:51 PM -----

From:

Tom Anderson/AA/USEPA/US

To:

Jim Snyder/AA/USEPA/US@EPA

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08/17/2011 03:48 PM

Subject:

Re: Fw: VW Group Methane Deteroriation Factors

Jim,

First Part of the Question: - N2O DF for assigned N2O value of 0.10 g/mi.

Mike is correct, the manufacturer can use the N2O emission standard of .010 g/mi in the optional CREE calculation and they do not have to this value (they only have to apply the N2O & CH4 DF if they use an actual measured values). See the regulation reference below:

§ 600.113 - 12 Fuel economy and carbon-related exhaust emission calculations for FTP, HFET, US06, SC03 and cold temperature FTP tests.

600.113-12 (g), (2), (iv), (C)

- (iv) For manufacturers complying with the fleet averaging option for N2O and CH4 as allowed under § 86.1818–12(f)(2) of this chapter, N2O and CH4 emission values for use in the calculation of carbon-related exhaust emissions in this section shall be the values determined according to paragraph (g)(2)(iv)(A), (B), or (C) of this section.
- (iv) (C) For the 2012 through 2014 model years only, manufacturers may use an assigned value of 0.010 g/mi for N2O FTP and HFET test values. This value is not required to be adjusted by a deterioration factor.

Second Part of the Question - separate DF's which seem to be required for City/Highway tests?

Separate City and Hwy DF's are required in the current (initial GHG regulations) however, there is a change being made to this provision as part of the Heavy Duty GHG final rule (which has been signed but is not official until it is published in the federal register).

Here is the new language (which can be found in the unofficial version on the OTAQ website) for manufacturers using the optional CREE method of complying with the N2O and CH4 cap standards:

 $\S$  86.1823-08 Durability demonstration procedures for exhaust emissions.

- (m) Durability demonstration procedures for vehicles subject to the greenhouse gas exhaust emission standards specified in §86.1818. .......
- (m) (2) N2O and CH4. (i) For manufacturers complying with the FTP emission standards for N2O and CH4 specified in §86.1818–12(f)(1) or determined under §86.1818–12 (f)(3), FTP-based deterioration factors for N2O and CH4 shall be determined according to the provisions of paragraphs (a) through (I) of this section.
- (ii) For manufacturers complying with the fleet averaging option for N2O and CH4 as allowed under §86.1818–12(f)(2), deterioration factors based on FTP testing shall be determined and may be used to determine

full useful life emissions for the FTP and HFET tests. The manufacturer may at its option determine separate deterioration factors for the FTP and HFET test cycles, in which case each FTP test performed on the durability data vehicle selected under §86.1822 of this part must also be accompanied by an HFET test.

(iii) For the 2012 through 2014 model years only, manufacturers may use alternative deterioration factors. For N2O, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NOX emissions according to the provisions of this section. For CH4, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

From:	Jim Snyder/AA/USEPA/US
То:	Tom Anderson/AA/USEPA/US@EPA
Date:	08/17/2011 02:46 PM
Subject:	Fw: VW Group Methane Deteroriation Factors

Jim Snyder
Light-Duty Vehicle Group
Compliance and Innovative Strategies Division
United States Environmental Protection Agency
(734) 214-4946
snyder.jim@epa.gov
----- Forwarded by Jim Snyder/AA/USEPA/US on 08/17/2011 02:45 PM -----

From:

Tom

"Giles, Michael" <michael.giles@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

08/15/2011 10:21 AM

Subject:

VW Group Methane Deteroriation Factors

## Hello Jim,

As a follow up to my voice message, I was curious about the separate DF's which seem to be required for City/Highway tests, as indicated in the regulations below. Note, we are using the fleet average option. For N2O we are using the standard (0.010) so I believe no DF applies.

I would like to discuss briefly if you are available.

Thanks, Mike

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

\_\_\_\_\_\_

Title 40 § 86.1823-08(m)(2)(ii) and (iii)

- 2) N 2 O and CH 4. (i) For manufacturers complying with the emission standards for N2O and CH4specified in §86.1818–12(f)(1), deterioration factors for N2O and CH4shall be determined according to the provisions of paragraphs (a) through (I) of this section.
- (ii) For manufacturers complying with the fleet averaging option for N2O and CH4as allowed under §86.1818–12(f)(2), separate deterioration factors shall be determined for the FTP and HFET test cycles. Therefore each FTP test performed on the durability data vehicle selected under §86.1822–01 of this part must also be accompanied by an HFET test.
- (iii) For the 2012 through 2014 model years only, manufacturers may use alternative deterioration factors. For N2O, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NOXemissions according to the provisions of this section. For CH4, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.
- (3) Other carbon-related exhaust emissions. Deterioration factors shall be determined according to the provisions of paragraphs (a) through (I) of this section. Optionally, in lieu of determining emission-specific FTP and HFET deterioration factors for CH3OH (methanol), HCHO (formaldehyde), C2H5OH (ethanol), and C2H4O (acetaldehyde),

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manufacturers may use the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

.....

## §86.1818-12(f)(2)

- (f) Nitrous oxide (N 2 O) and methane (CH 4) exhaust emission standards for passenger automobiles and light trucks. Each manufacturer's fleet of combined passenger automobile and light trucks must comply with N2O and CH4standards using either the provisions of paragraph (f)(1) of this section or the provisions of paragraph (f)(2) of this section. The manufacturer may not use the provisions of both paragraphs (f)(1) and (f)(2) of this section in a model year. For example, a manufacturer may not use the provisions of paragraph (f)(1) of this section for their passenger automobile fleet and the provisions of paragraph (f)(2) for their light truck fleet in the same model year.
- (1) Standards applicable to each test group.
- (i) Exhaust emissions of nitrous oxide (N2O) shall not exceed 0.010 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.
- (ii) Exhaust emissions of methane (CH4) shall not exceed 0.030 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.
- (2) Including N 2 O and CH 4 in fleet averaging program. Manufacturers may elect to not meet the emission standards in paragraph (f)(1) of this section. Manufacturers making this election shall include N2O and CH4emissions in the determination of their fleet average carbon-related exhaust emissions, as calculated in subpart F of part 600 of this chapter. Manufacturers using this option must include both N2O and CH4full useful life values in the fleet average calculations for passenger automobiles and light trucks. Use of this option will account for N2O and CH4emissions within the carbon-related exhaust emission value determined for each model type according to the provisions part 600 of this chapter. This option requires the determination of full useful life emission values for both the Federal Test Procedure and the Highway Fuel Economy Test.

Michael Giles
Certification Specialist
Engineering and Environmental Office
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326
United States of America
Phone +1-248-754-4229
FAX +1-248-754-4207

To: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]

From: CN=Willem VandenBroek/OU=AA/O=USEPA/C=US

**Sent:** Thur 8/18/2011 5:19:56 PM

Subject: Re: VW Group - Bentley Mulsanne Application

Jim,

I found 42 instances between mid-2005 and the present where VW has submitted the forms for a family or group of families before the payment was received. I suspect that this is the case here as well. All payments we have received to date are already accounted for. If this is regarded as paid by VW, I need to know the date that the ACH payment was made and I'll do some more looking.

Bill

From: Jim Snyder/AA/USEPA/US

To: "Rodgers, William" < William.Rodgers@vw.com>

Cc: "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>,

Willem VandenBroek/AA/USEPA/US@EPA

Date: 08/18/2011 12:59 PM

Subject: Re: VW Group - Bentley Mulsanne Application

Hi Bill, I have to Ex. 6 but I 've been looking through the cert app. Looks okay so far except that the fee payment isn't in our database yet. I see by the form that it was submitted 8/10 so its probably not thru the system yet.

I'm off tomorrow but I'll leave a copy of the fee form with Bill in case they was a problem with the checking labeling .

Jim Snyder Light-Duty Vehicle Group Compliance and Innovative Strategies Division United States Environmental Protection Agency (734) 214-4946 snyder.jim@epa.gov

From: "Rodgers, William" < William.Rodgers@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Giles, Michael" <michael.giles@vw.com>

Date: 08/17/2011 10:56 AM

Subject: VW Group - Bentley Mulsanne Application

Hello Jim,

Just a heads up, I submitted a certification request and application for the Bentley test group CBEXV06.84LA. This is a carryover test group from 2011 with no changes. All of the Verify release 8 changes in Section 7 of the application have been satisfied with no place holders necessary.

We have been delayed getting this application submitted due to OBD discussions (see Sec.16 OBD approval letter) so scheduled SOP is rather soon. Any effort you can make to prioritize this Certificate would be appreciated.

Please let me know if you have any questions.

Regards, Bill Rodgers VWGoA

To: Linc Wehrly/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im
Snyder/AA/USEPA/US@EPA[] Cc: Ex. 7 @vw.com]
From: Ex. 7
Sent: Fri 8/19/2011 3:26:23 PM Subject: Volkswagen/Audi Visit
Casjoon Volkowagotiin kaat Viole
Hello Linc and Jim:
Tieno Enic and Jim.
Long writing to inquire about the qualitability of FDA staff to meat with your contains from VAA and Audi
I am writing to inquire about the availability of EPA staff to meet with representatives from VW and Audi on Thursday, September 29, 2011.
We have some folks visiting the US for a number of meetings, and would like to use the opportunity to
discuss some topics with EPA. Our proposal is to meet with EPA staff in the morning of the 29th to discuss
Tier 3 topics. These arrangements are being made separately.
I am interested in setting up a meeting in the afternoon on the 29th to discuss PHEV fuel economy and
labeling, and other certification/emission testing topics. We would like about 2 hours in the afternoon.
Please let me know if this fits your schedules. I would appreciate it if your could suggest/invite other EPA
staff as appropriate.
Best regards,
Ex. 7
<b>F.</b> _ <b>7</b>
<b>Ex.</b> 7
Engineering and Environmental Office
Volkswagen Group of America, Inc.
Ex. 7
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